



88001877

FINAL RED HILLS MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT



HD
243
.C2
L37
1985

Bureau of Land Management

Bakersfield District



IN REPLY
REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
63 Natoma Street
Folsom, California 95630

Dear Reviewer:

Enclosed for your review is the final Red Hills Management Plan. This Management Plan and Assessment provides the decisions and actions for managing the use of approximately 7100 acres of public lands in the Red Hills of Tuolumne County.

This final plan was postponed because several reviewers of the draft had concerns over finalizing the plan prior to our reviewing results of a sensitive plant study for the area. This final plan considers the results of the plant study (an abstract of the study appears in the Appendix) as well as many constructive comments provided by reviewers.

Also, we took several steps to prevent continued resource damage while awaiting completion of the plant study. These included actions proposed in the draft plan such as: increased patrols, a shooting closure along Red Hills Road (except at a designated shooting area), elimination of fuelwood sales and signing the area. Some commentors questioned whether or not these actions would be effective. To date these actions have done much to reduce resource abuse and littering in the area.

This document includes the final Management Plan, comments received on the draft Management Plan and Environmental Assessment, and revisions of the draft Environmental Assessment.

Your interest and comments were considered and appreciated in the development of this Management Plan.

Sincerely,

D.K. Swickard
Area ManagerBUREAU OF LAND MANAGEMENT LIBRARY
Denver, Colorado

88001877

Bureau of Land Management
Library
Bldg. 50. Denver Federal Center
Denver, CO 80225

Division of Land Management
Denver, CO 80226
Bureau of Land Management
Denver, CO 80226

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DECISION RECORD

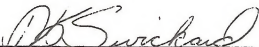
The proposed action, as modified, constitutes the Bureau's decision for management of the Red Hills. Modifications to the proposed action were made to include three features from the minimum use alternative:

1. The 40-acre tract recommended for disposal will be retained to protect sensitive plants and will become part of the restricted use zone.
2. The wildflower viewing zone will be increased from 200 yards wide to include the entire Red Hills Road "Canyon". These changes were made in response to public comments.
3. Military training and maneuvers are prohibited within the Red Hills.

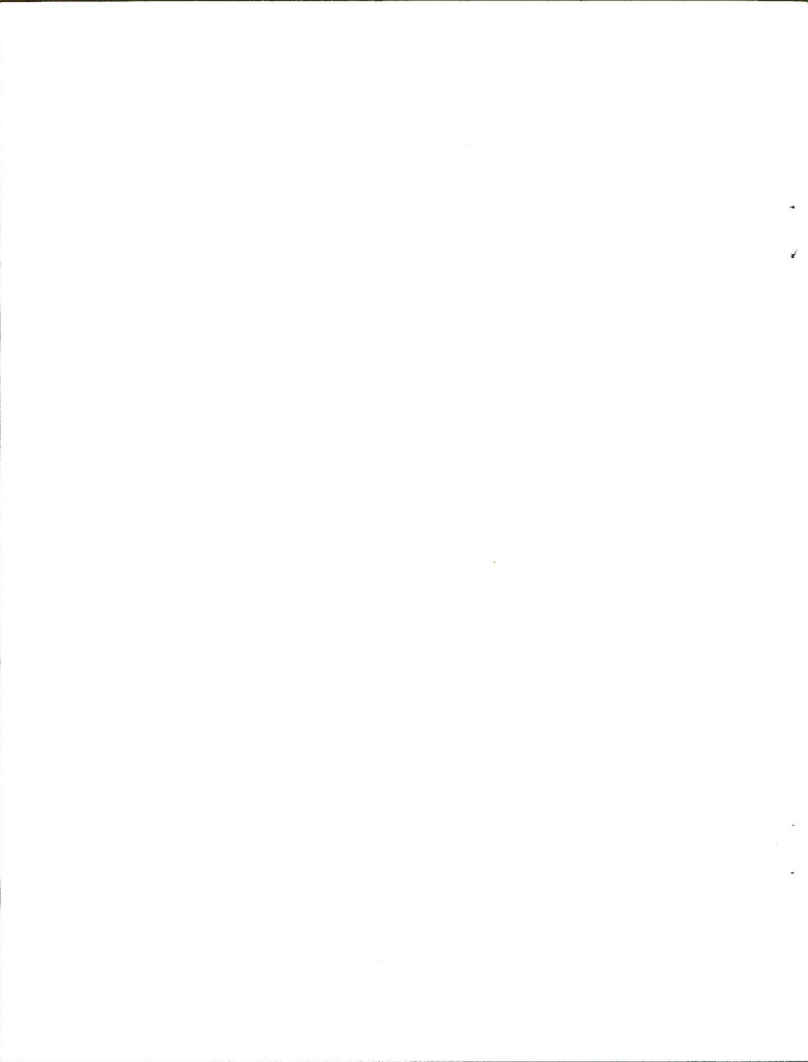
The proposed action, as modified, was selected because it achieves the management objectives for the area, ensures protection of sensitive resources and accommodates reasonable use levels. Present resource abuses will be significantly reduced or eliminated under this plan.

The No Action Alternative was rejected since it clearly failed to meet management objectives, as did the Maximum Use Alternative. The Minimum Use Alternative met most objectives but unnecessarily limited recreational use. Therefore, the proposed action was accepted after addition of two features from the Minimum Use Alternative.

Based on the Environmental assessment and public review of that assessment, the modified proposed action is selected. The Plan will not result in significant adverse impacts and is expected to result in significant positive impacts. An Environmental Impact Statement is not required.


Area Manager

2/17/85
Date



RED HILLS MANAGEMENT PLAN

A. INTRODUCTION

The Red Hills Management Plan is a multiple-use plan using the coordinated resource management concept. Rather than prepare separate activity plans (such as a Recreation Management Plan, Habitat Management Plan, etc.), this plan addresses all activities.

This plan addresses the following issues:

- (1) Protection of sensitive plant species and Bald eagle habitat.
- (2) Land Tenure Adjustment.
- (3) Unauthorized Use (fuelwood trespass and illegal dumping).
- (4) Indiscriminate shooting.
- (5) Off-road vehicle (ORV) use.
- (6) Wildfires.

This plan will implement Management Framework Plan (MFP) decisions set forth in the 1983 Sierra Planning Area MFP and will be implemented under Sikes Act authority with the California Department of Fish and Game (CDF&G).

The public has expressed a continued interest in the Red Hills area, especially concerning recreation and sensitive plants, and their input has been used in the development of this plan.

A Draft Environmental Assessment (EA) was prepared on the Red Hills Management Plan. It assessed the various alternatives considered. The Plan and EA were sent out for public review and comment. The Final Plan and EA were prepared using comments received on the draft.

Site-specific EAs will be developed for each project or group of projects as the plan is implemented.

B. OBJECTIVES

1. Protect the four sensitive plant species and their habitat to ensure that their official listing is unnecessary.

2. Protect and maintain digger pine roosting habitat as existing in 1984 on public land along the west shoreline of Don Pedro Reservoir.

3. Protect sufficient acreages of unique soils for future study and preservation.

4. Eliminate vandalism, resource damage, and littering caused by indiscriminate shooting.

5. Provide suitable areas for off-road vehicle use. Meet the current demand for organized ORV events. Provide for unorganized ORV activity year long.

6. Improve available habitat for resident wildlife species by providing permanent water sources for every one mile radius.

7. Eliminate unauthorized use in the Red Hills (especially illegal dumping and fuelwood trespass).

8. Reduce surface disturbing activities caused by wildfire suppression.

9. Provide opportunity to meet the existing demand for viewing the area's spring wildflower displays.

C. CONSTRAINTS

1. All discretionary proposals that will cause surface disturbance will have sensitive plant clearances, performed in the appropriate flowering season.

2. Winter roosting areas for the Southern Bald eagle will be protected as required by the Endangered Species Act.

3. Archaeological sites will be protected from surface-disturbing activities. Specific stipulations will be developed for each Project Environmental Assessment.

4. Maintain 600 lbs/acre of residual mulch after grazing for lands under lease.

5. Valid mining claims have prior existing rights as provided by the mining laws. Surface disturbance on mining claims is regulated by surface management regulations (43 CFR 3809).

6. A R&PP lease closes the area to mining and prohibits any uses by the Bureau that are incompatible with the lease.

D. PLANNED ACTIONS

1. Designate 4,500 acres as a Restricted Use Zone (RUZ) as a primary protective measure for the sensitive plants and soils and limit cumulative surface disturbance to a maximum of 5 percent. Close the Restricted Use Zone to ORV activity and nominate as an Area of Critical Environmental Concern (ACEC).

2. Protect riparian areas from discretionary surface disturbance along with the entire population of California Verbena.

3. Protect 90 percent of the population (population estimate obtained from sensitive plan contract) of Congdon's Tomatium and Red Hills soaproot from discretionary surface disturbance in the Intensive Use Zone (IUZ) and 95 percent of the population in the RIUZ).

4. Protect 95 and 100 percent of the habitat of Rawhide Hill onion from discretionary surface disturbance in the IUZ and RUZ, respectively.

5. Construct boundary fence around an isolated 40-acre tract. (Located in T. 1 S., R. 13 E., Sec. 1, SW $\frac{1}{4}$ SW $\frac{1}{4}$)

6. Sign riparian areas along major access routes.

7. Monitor surface disturbance to sensitive plant habitat by means of low level (1:7000) aerial photography taken at 3-year intervals. In conjunction to general photos, Bureau personnel will yearly evaluate surface disturbance through periodic patrols.

The preceding planned actions will ensure the protection of sensitive plant species and their habitat so that official listing by Fish and Wildlife Service will be unnecessary.

8. Lock the gate to Six Bit/Poor Man's Gulch during winter.

This action will ensure the protection and maintenance of winter roosting sites for Bald eagles and reduce road damage.

9. No discretionary surface disturbance will be permitted in 110 acres designated as protected soil sites. This action will ensure the protection of a minimum of 110 acres of unique soil type for future study and preservation.

10. Allow no military maneuvers for training purposes in the Management Area.

11. Encourage the adoption of a county ordinance to eliminate indiscriminate shooting within 1/4 mile on either side of Red Hills Road in the Red Hills.

12. Clean up all dump sites and litter at least on an annual basis.

These preceding actions will eliminate vandalism, resource damage and littering associated with indiscriminate shooting and military maneuvers.

13. Designate 2,600 acres as an Intensive Use Zone and allow a cumulative surface disturbance of up to 20 percent. Within this zone ORV events and activity will be limited to designated roads and trails.

14. Retain 30.5 miles of roads. Put to bed 7.2 miles of trails. Construct 1.1 mile of ORV trail if future demand warrants. Trails put to bed will be blocked off, scarified, and allowed to revegetate naturally.

15. Develop an ORV staging area by fencing the area, installing two vault toilets, six fire rings and one dumpster.

16. Sign points of entry and exit in the Management Area. Place interpretive signs at all major entrances into the Management Area.

The actions would provide suitable areas for ORV use and meet the demand for organized ORV events and unorganized ORV activity year long.

17. Cooperate with the Department of Fish and Game on wildlife releases in Six Bit and Poor Man's Gulch.

18. Install two water guzzlers for upland game.

19. Issue no new grazing leases and examine grazing's impact on rare plants near Poor Man's Gulch.

20. Allow no fuelwood sales within the Management area.

These actions will improve available habitat for resident wildlife species.

21. Develop a cooperative agreement with Tuolumne County Sheriff

Department to patrol the Management Area. This action will eliminate unauthorized use in the Red Hills Management Area.

22. Coordinate with California Department of Forestry to develop a Modified Suppression Plan for the Restricted Use Zone.

23. Detail an Environmental Specialist to all wildfires in the Red Hills. These actions will reduce surface disturbance resulting from fire suppression activities.

24. Protect the entire Red Hills road canyon (as shown on Map 8 of Draft Management Plan) from discretionary surface disturbing activities, except at ORV entry points, shooting area and staging area.

E. IMPLEMENTATION

<u>Action</u>	<u>Work Months</u>	<u>Cost (\$)</u>
Monitoring*	1.0	--
Water Developments	1.0	4,000
Monitor rare plant habitat*	.25	3,500
Contract study for rare plants**	.5	10,000
Develop mod. supp. plan	.5	--
Develop coop. agree. w/T. Co.*	.25	5,000
Construct Shooting Area**	.5	--
ACEC designation process	3.0	--
Sign program	1.0	1,500
Litter removal*	1.0	--
Develop staging area	.5	2,000
Install gate**	.25	300
Total WM	= 9.75	26,300

WM Cost = 24,875

Total Cost = 50,175

* - Action to be completed annually.

** - Completed Projects.

F. MONITORING

1. Flora & Fauna

Wildlife habitat conditions will be monitored in conjunction with CDF&G. Joint inspections will be conducted at least annually. Vegetation plots and photo plots will be established. Lot level (1:7000) aerial photography taken at 3-year intervals will be used to monitor surface disturbance. Monitor Bald eagle habitat and populations annually.

2. Recreation

During the implementation of this Management Plan, brief questionnaires will be made available for the users of this area to fill out and return. This will provide data on the number in each party, purpose of visit, length of stay, hometown, etc.

After organized ORV events, the club or sponsor of each event will be required to furnish BLM with the number of participants, number of vehicles, length of stay, problems encountered, and any other information the authorized officer requests.

3. Range

The BLM and grazing lessee will make at least one joint inspection each year. Joint inspections during the grazing season will also be conducted if either the BLM or the operator feels there is a need. During these inspections, mulch levels will be sampled using the photographic utilization method. Examine grazings impact to rare plants and determine adjustments as needed.

4. Minerals

Conduct yearly compliance checks on claimants having submitted Notices or Plans of Operations.

G. COORDINATION WITH OTHER PROGRAMS

Being a Sikes Act Plan, it is closely coordinated with California Department of Fish and Game.

H. EVALUATIONS AND REVISIONS

Evaluations of the planned actions will be reviewed annually. Recommendations for revising or updating the Management Plan will be prepared.

This plan may be modified if data from monitoring, the results of the rare plant contract, or information from other sources reveals new concentrations of sensitive plants that need protection.

All planned actions are subject to review by the Area Manager. Modifications will be made following conference with the Department of Fish and Game and U.S. Fish and Wildlife Service.

Prepared by:

Rey Farve, Wildlife Biologist, Folsom Resource Area
Dave Moore, Range Conservationist, Folsom Resource Area
Kevin Clarke, Realty Specialist, Folsom Resource Area
David Harris, Natural Resource Supervisor
Andrew Yatsko, Archaeologist, Folsom Resource Area
Larry Vredenburg, Geologist, Folsom Resource Area

APPROVALS:

DK Swickard
Folsom Resource Area Manager

12/12/84
Date

Robert W. Rheimer Jr.
Bakersfield District Manager

2/11/85
Date

** Susan K. Noke*
Regional Manager, Dept. of Fish & Game,
Region 4

1/17/85
Date

*Conditioned on the premise that indiscriminate shooting is controlled through Bureau of Land Management regulation rather than a County ordinance and that this regulation does not interfere with legitimate hunting.

COMMENT LETTER #1

01 March 1984

Mr. D. K. Swickard
Folsom Resource Area
63 Natoma St.
Folsom, CA 95360


Dear Mr. Swickard,

I have reviewed the BLM's Red Hills Management Plan and Environmental Assessment and would like to comment on same.

While I am very much in favor of Alternative 3, which provides maximum protection for plant and animal species and unique soils, I find that Alternative 1 would be acceptable also for this area. I am very much aware of the difficulty in pleasing all users of this area, and appreciate the efforts made by your department to satisfy as many of the requests as possible while still protecting the flora and fauna for future generations.

I do favor maximum protection - once the species are gone, there is no going back and rewriting your plans and programs to bring them back again. The momentary pleasure of an ORV user could deprive all future generations of the enjoyment of a plant species or endangered animal. Your responsibility is not to weigh the desires of this user or that user of today - but the user of today against all the users of tomorrow and all the tomorrows thereafter.

Sincerely,


Louise J. Parker
3420 Darryl Lane
Modesto, CA 95350



COMMENT LETTER #2

THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

March 5, 1984

Mr. D. K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95630

Dear Mr. Swickard,

Many thanks for BLM's much-needed initiative in protecting the rare plants and soils of the Red Hills Area. Your draft Red Hills Management Plan and Environmental Assessment is an excellent document which thoroughly demonstrates the uniqueness and value of the botanical and soil resources of the Red Hills. Our group accordingly strongly supports and urges you to adopt your alternative 3 - the minimum use alternative - since this alternative clearly best provides for the goal of protecting the natural values of the Red Hills. Alternative 3 also provides more reliable protection for the sensitive species Eryngium pinnatisectum by retaining its habitat within BLM's jurisdiction.

2-1

- 2-1 We agree that Alternative 3 provides the best protection for the natural values of the Red Hills; however, this alternative limits uses that could be compatible with protection of natural values.

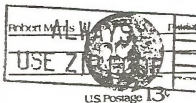
Sincerely,

As you can see by the final management plan, the 40-acre tract in T. 1 S., R. 13 E., Section 1 will be retained in BLM jurisdiction.

Glen L. Holstein, Ph.D.
Conservation Committee
Sacramento Valley Chapter
California Native Plant
Society



AS Mehdy
25205 Pine Hills Dr - PM
Carmel, CA 93923
36 MAR 1984



COMMENT LETTER #3



Mr. Dean Swickard,
Area Manager,
Folsom Area Office,
63 Natoma St.,
Folsom, CA 95630

Mar. 6, '84 3-1

Though Sections 7 and 8 are not within the area identified for ACEC designation, the restrictions placed on surface disturbance and the protection of sensitive plant populations will adequately protect the sensitive plants in the Intensive Use Zone.

Dear Mr. Swickard,

Please give your attention to the Pine Hills area. I find the new draft management plan does not adequately protect the rare plants in the area -- 5 species are

critical. Please give consideration to expanding the Area of Critical Environmental Concern to include the rare plants in Sections 7 & 8 & provide off-road vehicles in that Area.

3-1

Very Truly Yours,

Alice S. Mehdy
President, Monterey Bay Chapter
Calif. Native Plant Society
(25205 Pine Hills, Carmel, CA 93923)

March 15, 1984

COMMENT LETTER #4

D.K. Wickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95630

Re: Red Hills Area

Dear Mr. Wickard:

Please preserve as much as possible (at least 63%) of the Red Hills Area as a protected area for the plants and soil and protect life there as it was before dirt bikes and guns came to destroy it.

We who live here and treasure the beautiful wildflowers in this unique sector of Tuolumne County would grieve, as do the Red Hills themselves, if the present rape of the area continues.

So much of the land has already been damaged there and I hope you will do everything you can to support a plan that gives back to nature what is nature's'.

The gentle flowers do not deserve to be run over by dirt bikers and armies who cannot appreciate their importance and value.

Please Help!

Thank you.

Mr. & Mrs. L.A. Lindquist

Mr. & Mrs. L.A. Lindquist
16627 Meadow Lark Drive
Sonoma, California 95370



3/16/84

Mr. Swickard;

5-1 My wife and I are very disturbed that you may plan to designate land next to our property as an intensive use area. We have had many problems in the past from the military, the off roaders and spotters. We see this as making a bad situation worse. We are very mad about those using BLM land continually trespassing on our property. The road leading to our property we have maintained for twenty years. 5-2 The military and others have been tearing it up and no one has lifted a finger ~~at~~ to repair or help maintain it.

We have had military vehicles and others stuck on our property. We have had a truck of ours taken (stolen) and used by the military.

We have had a bullet come thru our window.

We have had our son almost ~~lose~~ loose an eye because of a tear gas grenade exploding in his hand after being left on our property by the military.

5-3 We are tired of our land and that adjoining us being littered, tore up and shot up.

our Parcel #

63-150-02-04



Sincerely,

John E. Moyle
P.O. Box 962
Sonoma, Ca.
95370

RESPONSE TO LETTER #5

- 5-1 The proposed action calls for an intensive signing program to clearly mark public land boundaries. This should help alleviate some of the problems of trespassing on private lands in the area.
- 5-2 Due to the problems encountered with the different military units in the Red Hills, we will be cancelling all Memorandums of Understanding with the Reserve units.
- 5-3 Hopefully, once the Plan is implemented, it will do much to eliminate illegal use and indiscriminate shooting in the area.

March 16, 1984

Comment on:

Draft Management Plan and Environmental
Assessment for BLM Lands in the Red Hills

From: John Buckley
P.O. Box 476
Miwuk Village, CA.
95346

After studying the entire draft of the management plan, the EA and appendices, I congratulate BLM for a fairly straight-forward, readable document that includes equally readable maps. I understand the pressure BLM will receive from various interest groups, and I also understand the limits that budget place on BLM management.

Accordingly I make the following responses:

- 1) I strongly approve of the proposed action, alternative 1. Although the minimum use alternative, (#3), might actually protect the public's resources to the greatest degree, I believe that the lobbying pressure of off-road clubs and individuals would make a minimum use proposal difficult. Thus, the compromise proposal makes sense.
- 6-1 2) Despite constant reiteration of plans to protect 90% or more of sensitive plants, I see very little actual measures in this document to ensure this protection. Simply signing a zone off-limits may be totally insufficient.
- 3) I strongly support limiting military maneuvers to conditions in action 11 on page 5.
- 4) I support a total ban on firewood sales. There is definitely not sufficient volumes of excess wood that would balance the impact of such an activity.
- 6-2 5) I question whether counting on Tuolumne County's law enforcement will result in adequate patrolling of this area. An additional part-time or full-time patrolman (BLM) might be necessary to meet management objectives.

6) Prescribed burning:

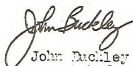
2

Wildfires---Being a wildland firefighter I can assure you that major wildfires will continue to occur in this area unless periodic prescribed burning is begun. Prescribed burning could be implemented in such a way as to almost completely reduce any effects on the sensitive plant locations by scratching a small hand-line (fireline) around sensitive zones and burning off from these lines or by timing prescribed burns for conditions best for sensitive species.

- 6-3 7) Close gate for eagle protection not only during winter but also first month of spring if Fish&Game feels eagle use during that period is likely.

Thank you for the chance to comment. Please let me know the final decision.

yours,



John Buckley

- 6-1 Management of the public lands depends a good deal on cooperation from the public. The term "discretionary surface disturbance" is used throughout the Plan. This means that when management has a decision to make concerning an event or project that will cause a disturbance, then management can limit the type and location of the disturbance. Signing an area is the means of educating the public as to the value or restrictions of their land; therefore, we feel that signing the area is just one step towards eventually protecting the resources of the Red Hills.
- 6-2 The Folsom Resource Area has worked closely with the Tuolumne County Sheriff's Department in the past and has received excellent results. Additional patrols by the Sheriff's Department, along with increased patrols by Bureau personnel and cooperation from the different user groups will help reduce unauthorized activities and meet management objectives. BLM does not have Rangers available to patrol the Red Hills though we agree this would greatly reduce illegal activity. Also, see "Dear Reviewer" letter.
- 6-3 Opening the gate leading down to Six Bit/Poor Man's Gulch will depend upon the late winter/early spring weather conditions. These conditions tend to influence the Bald eagle's migration patterns; therefore, we will open no gate before its time.



Mr. D.K. Swickard

B.L.M., Folsom Resource Area

63 Natoma Street

Folsom, California

© USPS 1983

\$56.30

~~\$53.60~~

Dear Mr. Swickard

3-20-84

R.E. Red Hills Management Plan and Assessment.

We wish to encourage the Bureau to adopt Alternative 3 (Minimum Use). We consider it very important to extend the greatest possible protection to this unique but already abused area. Our second choice would be Alternative 1.

Susan Hedges



Sincerely Yours
Tom L. Hedges

2000 Vista Drive, Modesto, California, 95355

COMMENT LETTER #8

DEAR MR. SWICKARD:

I HAVE REVIEWED THE DRAFT OF THE RED HILLS MANAGEMENT PLAN AND SUBMIT THE FOLLOWING COMMENTS.

3-1 AS HOLDER OF THE HARD KNOCKS PLACER CLAIM AND HAVING A SHARE IN THE NEW LULU PLACER CLAIM (THE LULU AND DUBBA HUBBA PLACER CLAIMS HAVE BEEN COMBINED INTO THE NEW LULU) I AM PRIMARILY CONCERNED WITH CONTINUING ACCESS AND RIGHT TO MINE ON POOR MANS AND SIXBIT GULCHES. AT THE PRESENT TIME MOST OF OUR WORK IS LIMITED TO SUCTION DREDGING AND HAND SLUICING. I WOULD LIKE TO INSURE FUTURE ACCESS FOR DREDGING AND OTHER POSSIBLE OPERATIONS SUCH AS TROMMELING WITH THE PROPER NOTICES OR PLANS OF OPERATION. I HOPE THAT ANY PLAN THAT IS ADOPTED WILL NOT BE TO RESTRICTIVE ON US.

THANK YOU



JOHN C. WALLIN
420 AMADOR CR.
MANTECA, CA. 95336

8-1 Valid mining claims are protected under the 1872 Mining Law. Surface disturbance associated with mining is regulated under our Surface Management Regulations (43 CFR 3809).

Winter closure of the road should not pose any new restrictions to mineral development in this portion of the RUZ, as this closure has been in effect since construction of the road. ACEC designation may be somewhat restrictive to mineral development in the RUZ by requiring a plan of operations on mining activities.

Resources Building
1416 Ninth Street
95814

(916) 445-5656

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Conservation Corps
Colorado River Board
Energy Resources Conservation
and Development Commission
Regional Water Quality
Control Boards
San Francisco Bay Conservation
and Development Commission
Solid Waste Management Board
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control
Board

COMMENT LETTER #9

Mr. Deane Swickard
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

March 23, 1984

Dear Mr. Swickard:

The State has reviewed the Red Hills Management Plan and draft Environmental Assessment, submitted through the Office of Planning and Research in the Governor's Office. Review was coordinated with the Water Resources Control Board, the Native American Heritage and State Lands Commissions, and the Departments of Boating and Waterways, Conservation, Fish and Game, Parks and Recreation, Water Resources, Food and Agriculture, Health Services, Forestry, and Transportation.

The Department of Fish and Game (DFG), the only agency to provide comments, believes that BLM has done a good job in attempting to plan a resolution to the current resource damage and abuse occurring in the 7,100-acre Red Hills area. DFG has the following specific comments:

- 9-1 1. Page 6, #12. Without additional specifics, DFG cannot agree to BLM's proposal for a County ordinance to eliminate indiscriminate shooting. DFG is concerned that the ordinance might infringe on the legal hunting use of the area. If a regulation is found to be necessary, DFG suggests a BLM regulation enforceable by the County Sheriff under a cooperative agreement.
- 9-2 2. Page 6, #19. Guzzler construction in this area of relatively low wildlife productivity should have low priority, with funding instead being used for other forms of wildlife habitat improvement. Substantial increases in wildlife from guzzler construction should not be expected, because available food or cover or both may be the major wildlife-limiting factors.

Questions should be directed to George Nokes, Regional Manager, DFG, 1234 East Shaw Avenue, Fresno 93710 or (209) 222-3761.

- 9-1 Enforcement of closure would be by Tuolumne County Sheriff's Department and Bureau Special Agents.

- 9-2 The Red Hills area is fair upland game habitat at best and substantial increases in wildlife numbers are not expected. The specific sites for guzzler location will be chosen with the assistance of the CF&G biologist.

Sincerely,

Stan Tapp

for Gordon F. Snow, Ph.D.
Assistant Secretary for Resources

cc: Office of Planning and Research

(SCH 84022007)



March 23, 1984

COMMENT LETTER #10

D.K. Swickord
Bureau of Land Management
Folsom Resource Area
63 Natoma St.
Folsom, California 95630

Re: Red Hills Management Plan and Environmental Assessment (Draft)

Dear Sir,

We have reviewed your management plan on the Red Hills area. We are pleased to note that you have considered the minerals industry in your plan.

Your alternative number 1 (the proposes alternative) seems to have a fair mix of intensive use lands versus restricted use. We are pleased to see that most of the old placer gold areas are in your intensive use area.

We ask that you continue to consider the known mineral deposits of Chromite, Magnesite and Gold in the future planning for the area. Please keep us on your distribution list for planning in Tuolumne County.

Sincerely,

Sonora Mining Corporation



J.B. Davis

COMMENT LETTER #11
Mr. D. K. Swickard
Bureau of Land Management
63 Natoma Street
Folsom, Calif. 95630

April 1, 1984

Dear Mr. Swickard

I have had an opportunity to study the draft of the Red Hills management plan. And the comments which follow are intended to be of service in development of the management plan.

In a way of introduction to myself, I am by academic training a professional botanist and by research, an expert on the rare and endangered plants of the Red Hills. In addition, I am a resident of Tuolumne county and have had an opportunity to observe the use of the Red Hills on a year around basis for 12 years.

Professionally, the draft report appears to show lots of thought but its balance between choices appears to show more of an effort to play politics than to provided for scientific choices.

for example:

11-1 | 1. in one part of the report, the percent of populations of rare plants is stated as to be preserved and in another part the number of acres to be used is stated. This is an illogical comparison.

11-2 | 2. Dispose of the very flat and ecologically valuable 40 acres in section 1. This site, which I have personally walked and surveyed contains rare plant species and excellent wildlife habitat. To lose this property without gaining new rare plant habitat for preservation is criminal. This is potential habitat for Brodiaea pallida, the Chinese Camp Brodiaea. This site is overgrazed and something must be done before it is completely destroyed. The land development company which
11-3 | previous wanted the property has gone out of business!

11-4 | 3. The armed forces of the United States already has millions of acres for maneuvers. The Red Hills ecosystem does not occur any where else in the entire world, their training here does not help for overseas combat. Let them go elsewhere!

4. The concept of gun clubs and police training has already resulted in a major fire and more will follow. The Red Hills ecosystem is not a fire maintained ecosystem but it can quickly deteriorate to barren hills by the process of desertification. Both frequent fires and land clearing can hasten this process of devegetation.

11-5 | 5. ORV staging of events is a new use of the area. The activity is not suitable for either the soils or the ecosystem. The various laws of the United States, such as the Organic Act and Endangered Species Act, are protective from such willful destruction of public lands and commons. More destruction to the Red Hills ecosystem has occurred by ORV than all other groups combined. The continued use of the Red Hills ecosystem by ORV groups and individuals makes it mandatory that all of the Rare Plant species be fully classified as endangered by the Fish and Wildlife Service.

11-6 | 6. The California Verbena can not be protected by this action. Much of the population of this species is found in streams outside the jurisdiction of the BLM. Even this month, I have observed placer miners along side Red Hills road, on BLM land, remove this species from between the rocks, as they look for gold. And since the main populations are in Six-Bit Gulch as it passes alongside Red Hills Road and outside of BLM properties, those population on BLM must be preserved. All streams within the Red Hills Ecosystem must be placed under full protection and this may mean obtaining additional lands, by purchase or trade, to insure that the species is preserved.

11-8 | 7. The issue of rather another gun club, their is already one in the Red Hills , should be established continues to reappear. The idea would be dropped by the originators of the plan, if BLM would stop bring it up. Just because the BLM land is free, it does not have to be given away. Let this people buy land somewhere else for their very specific use.

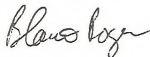
11-9 | 8. It is rather unfortunate that the writers of this draft report do not contain individuals with training in plant ecology. If you had one, such ideas of burning the landscape to control the fire would not appear. The fire map shows where people have been not where the vegetation burned itself on purpose. To control fire, keep the damn people out during the fire season and that includes police training and military activities. Any plant ecologist will tell you that the soils are limiting factors in the plant distribution in the Red Hills ecosystem. That major limiting factor is calcium. Calcium enters the soil profile by slow accumulation from humus. To have a rich diversity of plant life, humus must be allowed to accumulate. Burning of the landscape retards this accumulation of calcium and maintains the plant community as a dense brush field. If left to nature, digger pines will grow and shade out some of the buckbrush and thus reduce the fuel level by providing spaces between the bushes. The digger pines, by fog drip, add moisture to the soil which makes possible the growth of perennial range grasses. And at this stage, the site is more resistant to fire than sites which are annual burned.

9. The lost of wildflower viewing sites in the Red Hills is sad, very sad. This past weekend, I spent the day with an NBC news team filming a special news feature on Sierra Wildflowers. We did film some 30-40 species but the displays are quickly being ruined. The noise, during the taping of interviews, was more like some war zone. Between ORV's and light arms fire, it was a war between man and nature. The camera man, just returned from central america, felt very uneasy about the automatic weapons fire coming from nearby canyons. Even with camera's rolling, ORV's "buzzed" us and destroyed a population of california poppies. Until the entire area is signed as 'shooting and no off pavement travel by vehicles', no possible effort will work to return the area to former glory as a wildflower viewing site. Enforcement by BLM teams will not work until such time as they as individually believe that flower displays are worth saving. And until such time as wildflower viewing is considered a "recreational use".

As little as 5 years ago, both sides of Red Hills Road, from ridge to ridge was considered a wildflower viewing area. The site staging for ORV's was until two years ago, the 10 year old or more staging site for wildflower tours. The complete destruction of vegetation in that area has been the direct results of BLM management decisions. A simple **NO** to the use of ORV'S at that time would have prevented the growth of use which is so much higher now.

11-10 10. The cure to the entire problem is to transfer ownership of the Red Hills to some public agency, California Park System, etc which is set up to provided for the preservation of sensitive land areas. The rare plants and the equally rare wildflower fields are important resources which will be lost if management techniques which are totally lacking in the understanding of natural processes are used. Or maybe the BLM of California could show some real leadership by developing a **wildflower park** in the Red Hills ecosystem. Such a resource action would be the first in this part of the state and it is a very appropriate action.

Blaine Rogers



21735 El Lobo
Sonora, Calif
95370

RESPONSE TO LETTER #11

- 11-1 The Plan calls for the protection of the area from various percentages of surface disturbance and protection of percentages of plant population (see page 4, #1, 3, & 4; pages 18, 28, 32 & 35 in the environmental analysis). The two are not meant to be compared against one another; they are meant to be used together for the protection of the resources.
- 11-2 See Response 2-1.
- 11-3 Fencing portions of this parcel will be done to protect sensitive habitat.
- 11-4 See Response 5-2.
- 11-5 We assume that your statement: "The activity is not suitable for either soils or the ecosystem" refers to ORV use of the area. ORV activity is a legitimate use of the public land and proper management can minimize impacts associated with ORV use.
- 11-6 We are not sure what "this action" refers to. However, planned action #2, page 4, prohibits disturbance to riparian habitat and therefore gives the species as much protection as administratively possible.
- 11-7 See Response 11-6.
- The policy of this administration is generally not to acquire additional lands. Perhaps some private organization (Audubon Society, Nature Conservancy, CNPS) could purchase these lands to protect the species.
- 11-8 Establishing another gun club is not an issue as identified on page 2.
- Alternative 3 does allow a small shooting area in Section 17, which would replace the indiscriminate shooting along Red Hills Road.
- Nowhere within this Plan or EA is there any mention of "giving away" BLM land. The Bureau of Land Management does not have any such legal authority.
- 11-9 The Proposed Action does not recommend any prescribed burning within the Red Hills Management Area.
- 11-10 BLM is charged with multiple use management and has no legal authority to develop a park. The Plan, however, is intended to conserve the values that make this area ecologically valuable.

COMMENT LETTER #12

21798 Joyce Court
Sonora, CA 95370
April 2, 1984

Mr. D.K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

Dear Mr. Swickard:

I have studied the Red Hill's area and the BLM plan for improving the area while maintaining the multiple use now in effect. I will list some problems I foresee. The area most certainly needs and deserves to be improved. The road area is a horrible eye sore interspersed with delightful plants.

Problems:

- 12-1 | The funds budgeted are not sufficient.
- 12-2 | The planned supervision is not adequate.
- 12-3 | The eagles will be disturbed by the shooting range and recreational use of land overlooking their area.
- 12-4 | The wild flower corridor along the road is not wide enough to accomodate viewing all species.
- 12-5 | Evaluation by aerial photography at 1 - 3 year intervals is inadequate.
- 12-6 | A plan for correcting abuses, if found, is not presented, nor money budgeted for that purpose.
- 12-7 | Some of the endangered flowers are in heavy use areas.
An area that is not disturbed now, will be, by the location of the shooting range.
- 12-8 | Signs and Sheriff's partoling are a questionable deterrent to shooting and dumping trash.
Too many activities that are not compatible are being planned for too small an area.

- The multiple use concept for BLM land is evident here at Red Hills. However, this small area in accomodating these divergent groups, has deteriorated. Adding a shooting
- 12-9 | range to an undisturbed area will cause more disturbance of the land and the eagles. If all the shooters used the

COMMENT LETTER #12 continued

shooting range it would contribute to the safety of the other users. I doubt the target shooters would drive all the way to the range on the gravel road.

Would another government agency have more funds and enforcement power, perhaps the United States Forest Service?

12-10 If that isn't possible, could a council of representatives of the groups using Red Hills meet regularly to resolve problems? This would include a BLM representative, The Audubon Society, The Native Plant Society, The Black Powder Group, The Off Road Vehicle Group. Those with Grazing Rights. The National Guard, and The Tuolumne Gun Club. Probably the persons owning land surrounded by the Red Hills should also be included.

This unique area needs to be preserved for present and future users. The amount of use planned requires more management than offered in the BLM Red Hills Plan if the area is not to deteriorate further.

Respectfully,

Jane Kohler

- 12-1 Program cost estimates on page 7 are our best estimates. Funds are very limited and are projected to decrease. In the future we will be counting on not only Bureau funding and manpower but also possible contributed funds from the public along with volunteer labor. For example, during the Red Hills cleanups, numerous individuals and the California National Guard contributed both equipment and labor to accomplish the cleanups.
- 12-2 See Response 6-2
- 12-3 Objective #2 on page 3 of the Plan is to protect and maintain roosting habitat for the Bald eagles. The Bureau must comply with the Endangered Species Act when evaluating any projects that may disturb the Southern Bald eagle. If it is determined that a project or use of public lands will impact an endangered species and that any such impact cannot be mitigated, then the Bureau must either deny the project and/or restrict the use associated with the impact.
- 12-4 The wildflower view zone is intended to provide the general public that rarely gets out of their automobiles or when they do, do not walk very far from their cars, an opportunity to view the unique wildflower display. As you can see in the final Management Plan, this view zone has been elongated and widened.

COMMENT LETTER #12 continued - RESPONSES

- 12-5 Aerial photographic evaluation is one of the means planned to evaluate surface disturbance. In conjunction with aerial photographs, patrols by Bureau personnel will evaluate surface disturbance.
- 12-6 The Bureau of Land Management has Special Agents that have the authority to issue citations for illegal use of or destruction of public resources. Abuses are handled on a case-by-case basis in either a civil or criminal manner.
- 12-7 As explained on page 24, the four plant species of concern are considered by the U.S. Fish and Wildlife Service to be candidates for listing as endangered or threatened species. Therefore, in the technical sense they are not "endangered flowers" and we do realize that all four of the sensitive species are in the Intensive Use Zone.
- 12-8 See Response 6-1 and 6-2.
- 12-9 See Response 12-3.
- 12-10 This approach has merit. Once the Plan is finalized we intend to establish an ad hoc committee for the Red Hills. We hope you will consider participating.



5831 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4540

COMMENT LETTER #13

April 3, 1984

Mr. D.K. Swickard, Area Resource Manager
Bureau of Land Management
Folsom Resource Area
63 Natoma St
Folsom, CA 95630


Dear Mr. Swickard,

The draft Red Hills plan with assessment has been reviewed and we recommend the maximum use alternative #2 be adopted. We consider the proposed county ordinance and patrol support from the Sheriff's office to be helpful in minimizing shooting problems. However, construction of several rifle ranges will also reduce shooting problems to an acceptable level. We do not believe OHV recreation to be compatible with indiscriminate use of firearms. This is not to be construed with responsible use of firearms used in hunting.

We don't believe the endangered plant species are going to be adversely affected if OHV travel is confined to existing roads and trails. We see no reason to allow any firewood cutting at all, since it encourages people to take wood illegally. We concur with the proposed wildlife habitat improvements and protection.

We thank you for the opportunity to comment on the subject plan.

Sincerely,


Ed Dunkley
Administrator



March 30, 1984

A.K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95630

Dear Mr. Swickard:

Subject: Public Land Use Alternatives for the Red Hills of
Tuolumne County.

I have read the Red Hills management Plan and environmental assessment (draft) and have taken a ride through the Red Hills and witnessed the damage done by our fellow Americans.

This so called, "No man's land", is just that. It is a place where people destructively utilize public land. Believe me, I've seen outlaws with automatic weapons, shooting their beer bottles as they finish them off.

I have read alternatives one through four and feel that alternative one, the proposed, action, is the best.

Issue four, Indiscriminate shooting, I feel would reduce the worry of getting shot by a drunken plinker and reduce the litter created for targets. This would allow others to appreciate this land, rather than dread seeing it.

Issue Five, off road vehicle use, I feel, is another great idea. This would limit off the road vehicle use to designated roads and trails. This alternative will also protect the areas in need of protection, yet allowing of the road use.

I am the owner of a number of guns and a four wheel drive. There is a need, in my opinion, for the establishment of law and order in this area. The Red Hills have been subject to abuse long enough.

Sincerely yours,

Randy Harris

Randy Harris

Sidney R. Adelman
4068 Weslin Avenue
Sherman Oaks, California 91423

COMMENT LETTER #15

April 7, 1984


Dean Swickard, Area Manager
Folsom Area Office BLM
63 Natoma St.
Folsom, CA 95630

Dear Mr. Swickard:

I am concerned about the plan for the multiple uses of the Area of Critical Environmental Concern. The danger to the rare and endangered plants by the use of off-road vehicles is apparent.

15-1 I urge you to include the rare plant population in Sections 7 and 8 and to also close off the Area of Critical Environmental Concern to any use by off-road vehicles.

Sincerely,



15-1 See Response 3-1.

Planned Action number 1, page 4, states that the Restricted Use Zone will be closed to ORV activity.



THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

COMMENT LETTER #16

09 April 1984

D. K. Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

Dear Deane,

Thank you for the opportunity to comment on the Red Hills Management Plan. I appreciate your interest in seeing that this area achieve some appropriate management and protection. I am also sympathetic to the magnitude of this problem and the difficulties that the Red Hills pose as public land.

I have visited the Red Hills on numerous days this spring and must report that things have not changed. All of our work during the winter volunteer clean-up has been negated by the same wanton abuse. New trash has been dumped, shooters continue to conduct irresponsible acts, leaving litter everywhere and the ORV problem continues with the same intensity. Not that this should surprise you, but it simply reinforces the need for a stringent management plan, not a permissive one.

The management plan outlines the need and the plan to protect, but does so without sufficient manpower for enforcement. When this plan finally goes into effect, there will be need for obvious enforcement (i.e. uniformed personnel) initially until the "word gets out" that things have changed in the Red Hills. Perhaps later in time it will be necessary for only an occasional "pass through" by BLM or authorized personnel.

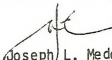
This impression comes from my observations of Red Hills users. They are not the law-abiding recreationists found at formal ORV parks and rifle ranges. They are the mavericks of their sports. They visit the Red Hills because no one is there to check their actions. They are there because they do not have signs; because they can be free of regulations and restrictions; because they can act without regard for others or property.

I am, as you know, entirely in favor of designating areas for use of public land. But I am concerned that the draft plan is not strong enough, does not limit intensive use clearly enough and does not have manpower as an assurance for its enforcement. While signs will be sufficient for the majority of Red Hills users, the presence of law-enforcement personnel and the threat of citation will be necessary for the mavericks.

Page Two

I am submitting my comments on the Plan. They are critical but, I hope, constructive. Again, thank you for your efforts in attempting to bring resolve to the Red Hills problem.

Sincerely yours,



Joseph L. Medeiros
Conservation Chairman
California Native Plant Society
North San Joaquin Valley Chapter
1108 Wellesley
Modesto, CA 95350
(209) 526-4078

P.S. I led a wildflower trip to the Red Hills on Saturday, 07 April 1984. More than eighty-five people showed up. Those that signed the attendance roster are enclosed for your files.



THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

COMMENT LETTER #17

09 April 1984

Comments On: RED HILLS MANAGEMENT PLAN and DRAFT ENVIRONMENTAL ASSESSMENT

By: Joseph L. Medeiros
Conservation Chairman
California Native Plant Society
North San Joaquin Valley Chapter
1108 Wellesley
Modesto, CA 95350
(209) 526-4078

General Comments

17-1 The Red Hills Management Plan (the Plan) and Draft Environmental Assessment (EA) are vague and over-generalized. The Plan proposes to "protect" plants with signs and a few fences and proposes to monitor damage from the air only every three years.

The Intensive Use Zone (IUZ) is too extensive and places a naive trust in Red Hills users.

17-2 The Restricted Use Zone (RUZ) is extensive, but the Plan does not guarantee plant and soil protection because of a) potential of 5% disturbance (too much), b) well-known interest in developing a large rifle-range in the RUZ, c) many rare plant locations in IUZ rather than in the RUZ.

The EA is very incomplete and reflects a lack of understanding regarding the significance of the Red Hills. It is lacking in content and possibly erroneous in some cases.

The Plan alludes to possible/potential law-enforcement in the future with no guarantees that such enforcement will occur.

The Plan designates a large RUZ but fails to consider appropriately the scenic and biological value of the resources in the proposed IUZ.

17-3 The Plan purports to disallow disturbances to the Management Area while the Plan is under review (p. 4, D.5.) but no attempt has been made to restrict destructive activities up to this time.

Specific Comments

17-4 1. The Plan and EA should not be mingled. An EA is a professional statement regarding the biological, physical, and ecological characteristics of a given resource area. The EA is very incomplete. It leaves out a long-existing list of vascular plants developed by BLM personnel. It lists only three mammals. No amphibians or reptiles are listed and only four birds are included. Five fishes are listed, three of which are only lake and river dwellers! It is apparent that, excepting the rare plants indicated, no "hard" look has yet been given to the resource area regarding its biological component.

Environmental consequences listed for Alternatives 1-4 are very vague and general. No studies have been conducted to determine the effect of soil disturbance on any

17-5 | plants (rare or otherwise) in the Red Hills. It is obvious that continued ORV use will negatively impact plants, yet the Plan and EA continuously offer "protection".

17-6 | There was much suggestion that unique soils were present within the serpentine hills but no discussion was included in the EA to elaborate on such soils.

17-7 | 2. The Plan proposes numerous protective measures through signing and fencing but offers the only enforcement of such measures by contracting with Tuolumne County for an occasional visit by the Sheriff's Department. It is clear (by past observation) that there will continue to be mavericks in the Red Hills that will disobey the law and injure the resources. High priority should be given to make contracts as soon as possible for law enforcement. Signing will instruct only the responsible user. Citation-capability of uniformed officers will discourage a few more. Only a concerted effort will eliminate illegal use of the Red Hills.

3. The BLM intends to restrict ORV activity to "existing roads and trails". This is opposite to what many users want to do with motorcycles and 4-wheel drive vehicles. Enforcement of such restrictions without authorized personnel is virtually impossible.

17-8 | The Plan should include at least one, challenging "free-play" area to accommodate this need (however primitive it may be). Perhaps the already existing runs in Sec. 18, T1S, R14E (5 1/2) should be designated as "free-play" with "existing roads and trails" designated elsewhere.

4. It is well known that a regional rifle club is desirous of a large tract of land upon which to construct a competitive range. This Red Hills Sportsman Association would like to use at least 300 acres in the southern section. While these are without a doubt the responsible citizenry of this sport, the southern section should not be considered for these reasons:

- 17-9 |
- a) An ACEC nomination will bring national focus to this area of the Red Hills (with due cause) because of its unique natural values. A rifle range will not be consistent with such an ACEC.
 - b) Soil disturbances in construction and maintenance will destroy the natural values of the ACEC.
 - c) Because of the proposed location (hillside), noise from the firing-range will disrupt the natural values of most of Sections 27 and 28, T1S R14E.
 - d) While only 300 acres may be physically used, the negative aspects of noise and traffic will disrupt as much as 1,000 acres of the southern section.
 - e) Rifle-range use will discourage other visitor use of the southern section (traffic, noise, etc.).

Perhaps there is an area within the proposed IUZ for potential use as a rifle-range. I would suggest the SE 1/4 of Section 7, T1S, R14E. Shooting could be directed into the hill that borders Sections 8 and 17. Access to the range could be easily gained from Red Hills Road at either Section 17 or Section 8.

Rawhide Hill onions in Section 7 could be fenced. (They would be far-better protected by the rifle-range users than by ORV users.)

Recommendations

A. Before Plan Augmentation

1. Signing

- a) Erect "No ORV"-type signs in Southern Section to prevent damage to the resource before plan goes into effect.
- b) Erect "Existing Roads and Trails"-type signs at both entrances to the Red Hills along Red Hills Road.
- c) Erect "No Dumping" signs at all entrances.
- d) Erect "No Shooting" sign at Lewisia area (Sec. 19).

2. Fencing

- a) Fence all sensitive areas for immediate protection:

-Lewisia, onions and wildflowers (in NE corner of Section 19, T1S, R14E), are in an area where shooting and ORV activity have been increasing to a very destructive point. Fencing and signing of this area would protect unique plants Lewisia rediviva, Allium cratericola, Streptanthus polygaloides, and Mimulus douglasii and protect a small creeklet coming down into this area that harbors many wildflowers in addition to the above.

3. Law enforcement negotiations

- a) Begin, immediately, plans to arrange or contract for law enforcement services in the Red Hills.

B. Plan Recommendations

1. Allow only less than 1% soil surface disturbance in ACEC area.

2. Include specific and restrictive language in the Plan to insure that future activities in the ACEC portion are consistent with attempts to keep this southern section natural and protected. Restricting soil surface disturbance does this only in part. Other considerations such as noise, litter, vegetation, and wildlife disturbance must be included.

3. Extend 100 yard (on each side) scenic corridor along Red Hills Road to entire length of the road excluding fenced staging areas, shooting ranges or access roads.

4. Create shooting areas along Red Hills Road and require that any shooting be done in these areas only. The Plan provides for only one such area. (I think there is room for three or four, perhaps designed for different distances or different caliber guns.) Keep the ranges relatively clustered together along the road and provide for orderly and safe parking.

5. Close ORV access road in NE corner of Sec. 19, T1S, R14E, that leads up to the hill in NW corner of Sec. 20. This would move vehicle traffic away from Lewisia area (Sec. 19) described in A.2.a. of my "Before Plan" recommendations.

6. Reduce total IUZ area designated for ORV use to accommodate future use of IUZ by other than ORV activity (e.g. rifle range). For a start, the southern half of Sec. 7 and the SW 1/4 of Sec. 8 could be preserved for this type of future use.

7. Do not connect with new trails (as in Plan Alternative 1) the ORV roads in Sec. 20 with those of Sec. 19. This would keep ORV activity in the northern half of Sec. 20 which would be sufficient and keep vehicles from going back to the sensitive plant area in the NE corner of Sec. 19.

- 17-20 | 8. Allow "free play" by ORV's in the southern half of Sec. 18 with clear understanding that this is the only "free play" area and that all other areas are limited to existing roads and trails.
- 17-21 | 9. Monitor resource area on the ground annually for soil disturbance, vegetation disruption, sensitive plant impact and resource degradation.
- 17-22 | 10. Request free assistance from local conservation organizations and individuals for monitoring programs requested in number 9 above.
- 17-22 | 11. Conduct further inventories of the fauna, soils, flora and other important ecological components of the resource area.
- 17-22 | 12. Request free assistance from local conservation organizations and individuals for such inventories and important ecological information.
- 17-1 See Response 6-1, 6-2 and 12-5.
- 17-2 (a) In our opinion, protection of 95% of the RUZ from surface disturbance and 100% of Verbena, 100% of onion, and 95% of Lomatium and soaproot populations will guarantee soil and sensitive plant protection.
- (b) On page 26, the EA refers to the interest of developing a rifle range. Until such time that we receive a formal application for such a development, and go through the environmental assessment process, it is impossible to evaluate its impacts on sensitive plants and unique soils.
- (c) The sensitive plant study indicates that the sensitive plant species are spread throughout the Management Area with higher densities in the RUZ.
- 17-3 The second sentence on page 4, D5 of the Draft Management Plan should have read "Allow no discretionary surface disturbance..." See "Dear Reviewer" letter.
- 17-4 A complete list of flora and fauna obtained from inventories conducted in the Red Hills are available in our Resource Area Office. The list in the EA was intended to be general in nature as most plants and animals are not significantly impacted by the proposed action and alternatives.
- 17-5 Limiting ORV activity to designated roads and trails should minimize impacts to plants.
- 17-6 The unique soils were discussed in Chapter 3 on page 22.
- 17-7 See Response 6-2.
- As soon as funding permits, the contract with the Tuolumne County Sheriff's Department will be negotiated.
- 17-8 Since there has been no demand for a "free play" area by ORV groups that reviewed the Plan, additional disturbance caused by a "free play" area is felt to be unnecessary.
- 17-9 See Response 17-2(b).

COMMENT LETTER #17 continued - RESPONSES

- 17-10 See "Dear Reviewer" letter.
- 17-11 Our first priority is to protect the four sensitive plant species in the Management Area (Objective pg. 2). No special consideration is given to nonsensitive species.
- 17-12 See Response 17-7.
- 17-13 See Response 17-2(a).
- 17-14 The objective of the plan is to protect key resource values while allowing other uses in the Management Area.
- 17-15 See Response 12-4.
- 17-16 Construction of additional shooting areas other than the one proposed will depend upon the demand.
- 17-17 This access road will be closed. See Revisions and Errata.
- 17-18 The IUZ is not designated exclusively for ORV activity. The Intensive Use designation allows for future activities that fall within the constraints of the plan.
- 17-19 The proposed trail as described in Alternative 1 has been changed, In order to complete the ORV loop, it may be necessary in the future to construct a trail to provide access to the main road via the center of section 19 (See Revisions and Errata).
- 17-20 See Response 17-8.
- 17-21 See Response 12-5.
- 17-22 See Response 12-10.

These recommendations will be discussed with the ad hoc committee.

COMMENT LETTER #18

MRS. RALPH W. NEWTON
~~Box 3046~~ LIVERMORE, CA. 94550

7-9-84

Dear Mr. Swickard:

18-1 I hope you will increase
the area of the ACEC lands to
include the rare plant populations
of Sections 7 + 8. And also
18-2 will close off the ACEC to
eliminate Off Road Vehicle
use there.

Sincerely,

R.W. Newton

2131 Chatham Pl
Livermore, Cal.

18-1 See Response 3-1.

18-2 See Response 15-1.

April 9, 1984

Dear Red Hills Mgt Plan,

I am a resident of Tuolumne County. I have lived here for six years, having moved from San Diego. I love Tuolumne County and feel the sacrifices one makes to live here are well worth it i.e. unsteady employment, sparse cultural and educational outlets. The main reason I stay is to create for myself stimulating self directed work and a self sufficiency away from media and entertainment. One way I count on achieving that is through my love and appreciation of nature.

I was out at Red Hills last month to look at wildflowers but was on more than one occasion frightened away from areas by people who were shooting firearms. These people had simply pulled off the road, just a few yards and had proceeded to shoot toward trees and bushes. The area they were aiming at was where anyone could have been walking along. The mess and environmental damage broken bottles, etc., goes without saying.

It is an extremely dangerous situation there right now.

The areas I saw also had been run down by off road vehicles. The flowers had been trampled on and the terrain damaged. I feel very strongly that the Red Hills must be protected from needless wreckage by motorbikes and should be restricted to shooters. I am very afraid that someone is going to get hurt.

Please regard this letter with serious consideration for we must protect our natural resources.

Sincerely;

Dorinda L. Burns

10 April 1984

COMMENT LETTER #20

D. K. Swickard
Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, California 95630

Re: Red Hills Management Plan and Environmental Assessment

Dear Mr. Swickard:

With four partners I operate the Golden Sierra placer claim in Poor Man's Gulch in the Red Hills. The claim is recorded in Tuolumne County (Volume 28, Page 677) and constitutes the following dimensions: south half of south half of Government Lot #5 (apx. 10½ acres), and Government Lots 12 and 13 (42.50 acres each) of Section 26, T1S, R 14 E, MDB&M.

Being a small-scale placer miner, my interest naturally focuses upon the impact the Bureau's study may ultimately have on my right to work my claim in accordance with the Mining Laws.

As a miner who has dredged various areas of the Sierra, I don't believe in permanently altering the natural landscape; in fact, I prefer that nature remain as she basically is. Vandals and other undesirables---as you must well realize---are generally the people who litter, illegally fell trees, start fires, pollute streams, exploit wildlife, and just basically mutilate an area. On the other hand, most legitimate miners (I know all of them in Poor Man's Gulch) are more friend than foe to nature. We don't like litter and we don't like hordes of people terrorizing the terrain. (A good example of the vandal potential in the Six Bit-Poor Man area is the government gate someone cut last year with a torch.)

As you may or may not know, the creek in Poor Man's Gulch virtually dries up in summer. To survive, the small perch and minnows either have to withdraw to Don Pedro Lake or sustain in a hole enlarged by our dredging. Even when the stream is running well, the fish are so small that no self-respecting fisherman would waste his time with them. Yet I have seen people in both Six Bit and Poor Man's purportedly on fishing ventures. Nor is there any genuine attraction for campers---no holes deep enough for swimming, no sanitary facilities, essentially nothing for families to do except stir up the rattlers and increase the fire hazard.

Most people who wander or venture into the Six Bit-Poor Man's area and beyond are hunters, wood scavengers, claim jumpers, or kids looking for a remote place in which to party.

20-1 | I would strongly suggest that wood-cutting in the area be stopped immediately. I would equally suggest that you lock year-round the Six Bit-Poor Man's gate. The road is dangerous, virtually one-way, and dead-ends. It's only a matter of time until some green-

horn plunges off into one of the canyons, gets snake-bitten, or falls and breaks an arm or leg---miles from medical help.

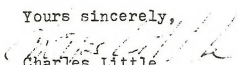
To actually drive to our claim requires a four-wheel-drive, and we have tried to maintain a course of sorts. For people who use a 4X4 for sports purposes, the area beyond the Six Bit-Poor Man's gate isn't practical unless you want them tearing up the existing road and indiscriminately "blazing" new ones. Shooters, too, are a nuisance---and a dangerous one. Some who have wandered into our area set up cans, bottles, or targets and begin blasting away. They're also not above shooting at trees, birds, rabbits, coyotes, deer, harmless water snakes, and what have you. On one occasion last year I encountered four men I did not know camped on a friend's claim. Armed to the teeth, they told me they were fishermen. They were also drinking and smoking marijuana and letting the good times roll---and littering. I had a small pistol and ran them off, even though, legally, I didn't have that right. If the area beyond the Six Bit-Poor Man's gate is developed to any degree, the region will be overrun by gentlemen like the four I've just described.

It's true that, during the gold rush and the depression, most profitable mining occurred in Six Bit Gulch, although the upper stretch of Poor Man's yielded quite a lot comparatively. At \$20, then \$25, an ounce, the old timers didn't hang around unless the diggings were impressive. But I can tell you that there is gold in Poor Man's Gulch. Most of it is small flakes and fines, but it is there, and I believe that it's washing down from an exposed vein on Hungry Hill. With adequate effort, the gulch can be profitably mined. For example, on one three-day effort last year we recovered 2 ounces from a 10' x 3' x 2' section of the creek.

So far as the rare plants are concerned, grazing and kids in four-wheel-drives are probably more of a threat to them than anything except fires.

Come visit our claim sometime when we're operating. I think you'll approve of our methods.

Yours sincerely,


Charles Little

20-1 See page 6 planned action number 21

P.O. Box 212
Long Barn, California 95335

This road was constructed as a mitigating measure for the Lake Don Pedro Project, to provide recreational access to the lake. Therefore, this gate will be left open to provide the recreation access it was built for, and closed only during the winter months.

4/11/84
Hughson CA

Mr. Dr. Swickard, Area Manager
Bureau of Land Management
63 Natana St
Tolson CA 95630

Dear Mr. Swickard

I would like to make the following comments on the Red Hills Management plan. Quite a few years ago the Red Hills Road area was a very popular and peaceful spot for family picnicking etc. Today a certain lawless element has taken over to the point that I no longer see any family activities, especially on weekends. I could tell you of the many abuses that unthinking and careless people are perpetrating on this area but I'm sure you've seen that for yourself.

About ten years ago I started a new hobby of photographing wild flowers. To my delight I found that there was a great concentration of many rare and/or beautiful flowers in the Red Hills. The greatest diversity of species for some reason was on and near Red Hills Road. After ten years of very pleasurable effort

I now have a collection of over 2000 color slides of Red Hills Flora. About 3 years ago I realized that with the advent of "machos" - fun machines (ORVs) much of what I liked about the Red Hill was disappearing. About that time I wrote to BLM about my concern for the apparent destruction of this unique wildflower area.

I hope very much that BLM and local law enforcement agencies can get the wilful destruction of the area stopped. "Alternative 3", if enforced, would certainly help.

At one time I was a mining geologist and as such I've always been most interested in the serpentine areas of California. In San Benito county and in the Del Puerto area of Stanislaus County considerable areas of serpentine have been turned over to the ORVs. Since

21-1 The thin soils derived from serpentine are full of asbestos (tremolite & chrysotile) it seems obvious that ORV users are inhaling an awful lot of asbestos fibre

21-1

It would probably be wise, and in the best interests of all concerned, that the uses of these areas be given proper warning. I've been in enough old mines and inhaled enough dust that I'm rather blasé about the so-called "high risks", but some people in our Society take such things quite seriously.

The thin serpentine soils I've referred to erode very easily so that any disturbance caused by tire tracks quickly becomes a deep rut. One hill just to the north of the most used shooting area started with a single set of tracks a year ago. Today those tracks are so deeply rutted as to be unusable therefore five new sets of tracks have taken over the hill. I have a considerable amount of "before & after" slides I'll give you if you're interested.

Please keep my name on
your mailing list and

Good Luck,
Dana Hughes

- 21-1 Asbestos, an alteration product of serpentine is not known to occur in the Red Hills. However, magnesite, another alteration product, is found in the area. We intend to sample the soil in the area for asbestos and take necessary steps to post the area if asbestos is found.

Dear Mr. Swickard

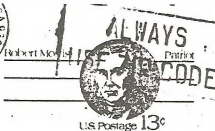
I've just had an opportunity
to read the presentation made to
you by Joe Medeiros on 9 April.

I can endorse most wholeheartedly
Mr. Medeiros' remarks. No plan
can reverse the damage now being
done without the help of enforcement
people. Signposts, and a few small
fences will have absolutely no effect.

Thank you

Waverly Hughes

STUART M. BLOOM, M.D.
2533 East Main Street
Ventura, CA 93003
(805) 652-2244



COMMENT LETTER #22

© USPS 1981

Mr Dean Surehard
Area Mgr Folsom Area Office
BLM
63 Natoma St.
Folsom Calif 95630
4-11-84

Dear Sir,

22-1 I am disturbed by
the lack of closure of
the Red Hills (Tuolumne
county) A.E.C. to O.R.V.
Please strongly consider
closure to O.R.V. to
prevent damage to rare
plant communities

I thank you
Stuart M Bloom M.D.
Calif Native Plant
Society
Ventura Calif.

22-1 See Response 15-1,

COMMENT LETTER #23

1106 Harbert Ln
Modesto, CA 95350
April 11, 1984

D.K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma St.
Folsom, CA 95630

In re: Red Hills Management Plan and Environmental Assessment
(Draft)

Dear Mr. Swickard,

Thank you very much for sending me a copy of the Red Hills Management Plan and Environmental Assessment (Draft). My comments follow.

23-1 On page 48 you show only four common birds found in the area. I was just there last Saturday, and saw at least the following: Turkey Vulture, Scrub Jay, Common Flicker, Northern Mockingbird, Red Tailed Hawk, Brewer's Blackbird, Red Winged Blackbird, and Acorn Woodpecker. All of these birds are common in this area of the state, and are probably common in the Red Hills. I also saw a Belted Kingfisher. It may or may not be common in the Red Hills. To properly catalog the area, I would suggest that you contact one of the local Audobon clubs. They would probably be glad to help. They might want to use bullet proof vests however.

23-2 Under no circumstances should the present situation be allowed to continue. The public lands should not be allowed to be a dumping ground, nor should indiscriminate shooting or indiscriminate off road vehicle use be allowed. There are designated land fills that law abiding people use for their garbage. To allow people to use this area in such a manner is to encourage scofflaws, cause more unnecessary taxpayer expense, and ruin the public land for the law abiding citizen. The so called Alternative 4 is no viable alternative at all.

23-3 For people that want to use their off road vehicles, there are several established and controlled off road vehicle areas nearby. There are two established by Stanislaus County. One is near La Grange which is close to the Red Hills. The other is near Frank Raines Park, west of Patterson. Besides these areas there are places in the National Forests nearby that can be used by these people. There is no reason why they should be allowed to run wild over the Red Hills Area!

23-4 I am in favor of shooting. I would like to have a convenient area to go to, to do some shooting. To allow shooters to run amok, as is now allowed is pure foolishness however. I am in favor of shooting ranges being developed that are open to the public. The question here however is should such a range be developed on the public lands of the Red Hills. The reason that this is being considered is because these people think that they can do it cheaply on the Federal Government.

There is plenty of private land around which is available to use for development purposes. Shooting ranges cost money. A charge would have to be made to people who wish to use it. If a charge would have to be made, as it would, it can be made to develop such a range on private property. There is no reason why the local counties cannot work with the shooting organizations to find private property that could be used for this purpose, property which is better situated for such purposes.

23-5 The highest and best use of this land is as a park. In the Summer, people can go to the Sierras to camp and hike. However, even with all that area there, it is getting very crowded. In the Fall, Winter, and Spring however, there are few convenient places that people can go to hike and get out in the wild. Those who are wealthy can purchase property in which to do that. The rest of us must confine ourselves to public land of which there is not much around. That is the best use for the Red Hills.

I think that you have made a good start. However the alternatives presented are not sufficient. There should be another draft with more sophisticated alternatives. Meanwhile, no time should be lost in stopping the dumping, the indiscriminate shooting, and the indiscriminate off road vehicle use. We can always go back and ruin the land. Once it is ruined, it is too late to save what should have been saved.

23-1 See Response 17-4.

Yours Truly

23-2 Alternative 4, No Action is required in all environmental assessments and in some cases is a viable alternative.

Harry P. Drabkin
Harry P. Drabkin

23-3 The proposed action would regulate ORV activity to designated roads and trails.

23-4 See Response 17-2(b).

23-5 See Response 11-11.

COMMENT LETTER #24

649 Geer Ct.
Modesto, CA 95354
April 12, 1984

Mr. D. K. Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

Dear Sir:

I am writing you of a deep concern for the Red Hills area. In the past five years I have visited this area in all seasons except summer, and I have seen a steady decline in its condition. I took part in the clean-up a couple of months ago and was not surprised to find a large accumulation of trash on my last visit, this last Saturday, April 7.

Of the plans proposed for the Red Hills management, I opt for #3 but I have reservations about it.

24-1

I have grave reservations about the wisdom of placing a rifle range in the southern section. The present road doesn't look capable of carrying the additional traffic. Do you have money for improving the road or for policing the range? I would like to see NO development in the southern part and that includes no road improvement. Who but the "shooters" would be able to tolerate the noise pollution and the danger of getting shot. If the noise from the "shooters", traffic and accompanying campsites do not drive out what birds and wildlife is there, I am sure they will become prey to the irresponsible shooters, who are attracted to and not able to get onto the range.

The Red Hills Road area has become increasingly unattractive because of the noise and danger of getting shot, why extend it to another, as yet, unspoiled area?

A fence is needed to protect the rare and endangered plant species. This is the only way to keep vehicles off them and retain the soil necessary for their survival.

In other words, this whole area needs protection and policing, not development.

Sincerely yours,


Irene Potter

24-1 See Response 17-2(b)

FOOTHILL-SIERRA PEST CONTROL

21220 OLD SONORA - COLUMBIA RD.

SONORA, CA 95370

(209) 532-7378

COMMENT LETTER #25

13 April 1984

Dear Mr. Swickard,



I am writing to express my opinion on the Red Hills Management Plan. I would first like to complement you on doing a fine job! This is no easy task, negotiating with everyone.

I am in favor of alternative 3, minimum use. When I think of the foothills, fifty, or a hundred or two hundred years from now, all I see, if present growth trends continue, is ever increasing pressure on the region. Now would be the time to act to save as much of this pristine region. Overflow ^{from use area} unregulated activities would certainly damage our soil; at least alternative 3 would minimize this also, I hope.

Sincerely,
Darin Jassano

Q. 2034
 Arnold, Ca. 95223
 April 13, 1984

D. H. Swickard, Area Manager
 Bureau of Land Management
 63 Natoma Street
 Folsom, Ca. 95630



Dear Sir:

As a Member of the California Native Plant Society I feel the urgent need to protest the present management and future plans for the Red Hills Area.

The rare and endangered species which hundreds of wild flower enthusiasts, young and adult, visit each year are being annihilated by the indiscriminate use of the area by O. R. vehicles and people target shooting.

On April 7, 1984 we were fortunate to be led by Joe Maderos of Modesto Jr. College on a Wildflower hike in the Red Hills area and actually saw 16 species of plants, shrubs, and ferns including the rare onion, Allium craterae, the rare Red Hills lupplant, Chlorogalum grandiflorum, the rare Lomatium concolor plus the spectacular Montana State flower Butterroot, Lewisia rediviva which all grow on this serpentine area.

This area is also filthy with discarded trash gall blads and a disgrace to our state's beauty. The noise from the game was also annoying and a source of danger.

I urge you to use your authority as Manager of B. L. M. to restrict this area and find other less public places for these destructive and dangerous forces.

Thank you for your past and future efforts.

Carmen Stickling
 James Stickling

UNITED STATES GOVERNMENT

FISH AND WILDLIFE SERVICE

Memorandum

APR 16 1984

COMMENT LETTER #27

TO : Area Manager, Bureau of Land Management, Folsom Area Office,
63 Natoma Street, Folsom, California 95630

FROM : Acting Project Leader, Fish and Wildlife Service, Endangered
Species Office, 1230 "N" Street, Sacramento, CA 95814 (SES0)

SUBJECT: Draft Red Hills Management Plan and Environmental Assessment
(1-1-79-F-102)

In response to your request of 23 February 1984 for input regarding the draft Red Hills Management Plan (RHMP) and Environmental Assessment, our comments will deal primarily with the listed and candidate species affected by the proposed action and alternatives described in these documents. In order that you may more fully understand our position, we will detail our concerns and provide a chronology of our involvement in the Red Hills.

We are concerned about the fate of the Red Hills, an "ecological island" harboring several Federal candidate plants and the endangered bald eagle (Haliaeetus leucocephalus). (The term "Red Hills" refers in this memo to the Red Hills proper, Rawhide Hill, and Peoria Basin.) The candidate plants on public lands within the Red Hills include the Rawhide Hill onion (Allium sanbornii var. tuolumense), Red Hills soaproot (Chlorogalum grandiflorum), Congdon's Tomatium or parsnip (Lomatium congdonii), and Red Hills vervain (Verbena californica). Another candidate species, the Chinese Camp brodiaea (Brodiaea pallida), grows north of Taylor Hill but only on private land. Two other candidates, stink bells (Fritillaria agrestis) and shaggy-hair lupine (Lupinus spectabilis), may occur on public lands, however, no thorough search has been made for these species.

BACKGROUND INFORMATION

Our involvement in the Red Hills originated formally in an interagency consultation (1-1-79-F-102) pursuant to Section 7 of the Endangered Species Act on 14 November 1979. The resulting Biological Opinion dealt with the impact of a proposed off-road vehicle (ORV) designation on the bald eagle. (This species roosts and forages along the shore above Don Pedro Reservoir on public land.) Although we concluded that the proposed ORV designation would not likely jeopardize the eagle, we later (11 January 1980) detailed our concerns informally regarding the impact of the proposal on two of the candidate plants (Chlorogalum grandiflorum and Lomatium congdonii). In short, we stated that the "limited" designation proposed for the majority of the Red Hills was a *de facto* "open" designation. Thus, we recommended that a substantial portion of the Red Hills be designated as "closed" to prevent further degradation of candidate plant habitat by ORVs. We also recommended that this "closed" portion of the Red Hills be designated a Research Natural Area (RNA) or ACEC.

In a memo dated 7 April 1980, we reiterated our concerns expressed in the January memo and we detailed recent ORV abuses along Red Hills Road. The Folsom Area Manager indicated in a memo received on 8 September 1980 that he would retain the "limited" ORV designation originally planned for the Red Hills. Nevertheless, no final ORV designation has been made for the Red Hills (John Willoughby, pers. comm., 8 November 1983).

In a memo dated 30 September 1981, we discussed the results of a meeting on 27 August 1981 between representatives of the Folsom Area and State Offices, and my staff. It was agreed that BLM would develop a Habitat Management Plan (HMP) to determine what portion of the Red Hills would be protected and thus managed for the candidate plants. We also decided not to object to the granting of a Recreation and Public Purposes (R&PP) Act lease (CA-5183) to a local black powder group, the Sonora Smokepolers (Civil War Skirmish Association). Our position regarding this R&PP lease was contingent on the completion of the HMP and the insertion of stipulations in the lease to minimize impacts to the candidate flora.

27-1 | A draft section of a Management Framework Plan (MFP) for the Folsom Resource Area reiterated the general consensus of the August meeting held between our two agencies. The draft management prescription directed the consideration of an ACEC recommendation to protect the sensitive plants. It also imposed a closure of the eastern half (we have referred to this portion of the Red Hills as the "southern" portion or half in prior memos) of the Red Hills to ORVs and required the development of the HMP. Nevertheless, the summary of the final MFP failed to include any of these provisions within the Red Hills Management Area. Only a decision to "coordinate all activities that could significantly impact sensitive plants with the U.S. Fish and Wildlife Service" was retained which might afford some protection for the candidate flora. A provision to open the northern portion of the Red Hills to ORVs however was kept in the final MFP and in the directive to permit certain R&PP leases where "compatible with stated management goals." The management goals were primarily status quo with "an emphasis on recreation uses" like R&PP leases "while restricting some uses" for the protection of candidate species.

In November 1982, Gulf-Western Natural Resources Group proposed to use a portion of the public land within the Red Hills as one of two tailing disposal sites. Although the fate of these lands remains unknown, reportedly public land will not be used as a disposal site.

In early 1982, the Red Hills Sportsman (RHS) in cooperation with the County of Tuolumne (County) and National Rifle Association (NRA) proclaimed their interest in the construction of a large shooting range facility within the Red Hills. On 26 May 1982, representatives from the BLM, FWS, County, RHS, and NRA met in the Red Hills to discuss a potential R&PP lease application for the proposed range. We again detailed our concerns over the Red Hills and in particular the eastern portion. From the data available, we stated that this nearly unimpacted area was the most suitable portion of the Red Hills to protect from ORVs and other surficial disturbance. The construction of a large shooting range would, in our view, leave no significant area unimpacted harboring all the candidate flora.



County Sheriff Department. Thus, the RHMP will allow for the continued degradation of serpentine habitat in the Red Hills.

- 27-6 The designation of the RUZ as an ACEC for the proposed action and the minimum use alternative is essentially symbolic. Evidently development is permissible in an ACEC and thus this designation provides little if any protection for the candidate flora.

- 27-7 The proposed action will permit the surficial disturbance of up to 224 acres within the RUZ. Because the plan does not dictate whether this disturbance be random or evenly distributed, any development which would limit disturbance to less than 224 acres would be allowable under the proposed action. Consequently, the large shooting range facility proposed by the RHS, County, and NRA for the eastern portion of the Red Hills would be permissible. Given the magnitude of this proposal (seven shooting ranges, 89-unit campground, picnic area, over 300 parking stalls, and lagoon, total development encompassing 190 acres of surficial disturbance), the failure of the draft RHMP to exclude the development of this facility in the eastern portion of the Red Hills seems contrary to any goal of conserving candidate plants there. This facility in this portion of the Red Hills would subject the area to intolerable levels of recreational use and abuse as well as aggravate the potential for additional wildfires and related disturbance from suppression activities.

- 27-8 Although the proposed action in the RHMP states that no development will be permitted until after a plant survey is completed, it also indicates that surficial disturbance is allowable at some arbitrary discretionary level throughout the Red Hills. Specifically regarding the candidate flora, the RHMP states that from 2 to 10 percent of the population, depending on the candidate taxon, can be lost. We consider this guidance to be premature given the BLM endorsement of additional plant surveys.

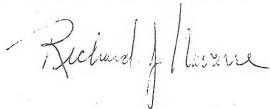
- 27-10 Except for the constraint of "sensitive plant clearances", the RHMP details no specific action, like fencing, to protect candidate species. Yet in light of the decision to permit some losses from populations and to emphasize "recreation uses" in the MFP, it seems the draft RHMP in reality places the goal of recreational use above that of candidate species despite the stated primary emphasis of the RHMP. Consequently, we strongly disagree with your view that the proposed action and the minimum use alternative would not threaten the long-term survival of the candidate flora. These species may well need to be listed, especially if the shooting range nears reality in the eastern portion of the Red Hills.

RECOMMENDATIONS

To reiterate earlier memoranda (7 April 1980, 30 September 1981, and 31 August 1983), Congressional inquiries (1 April 1983), and numerous conversations, a significant portion of the Red Hills should be designated in such a manner as to ensure the protection of the eagle and the candidate plants. Based on the best biological information available, we recommended and still recommend the eastern portion of the

27-12 public land within the Red Hills (T.1 S.R.14 E. Sections 22, 23, 24, 26, 27, and 28) be protected via an RNA. No discretionary surficial disturbance should be permitted in this area and fencing should be employed where needed to protect these populations and other significant populations elsewhere in the Red Hills. Our position continues to be that sufficient public land exists elsewhere in Red Hills to accomodate public uses.

We request that you keep us informed of the status of the development of the RHMP. If you have any questions, please phone either Jim Bartel or me at (916) 440-2791 or FTS 448-2791. Thank you for your time in this matter.



CC:
Butch Olendorff, U.S. Bureau of Land Management, Federal Building,
2800 Cottage Way, Sacramento, CA 95825
Regional Director, Portland, OR (AFA-SE)

JABartel:ahs

- 27-1 The summary of the Final Management Framework Plan (MFP) was just that, a summary. The management prescriptions outlining ACEC recommendation, closure of the south half to ORV activity, and development of a Management Plan are included in the final MFP signed by the State Director in February 1983.
- 27-2 See "Dear Reviewer" letter.
- 27-3 We have received several comments concerning our "arbitrary" method of obtaining percentages for providing protection of rare plants and soils. However, to date none of the comments have enlightened us with a less "arbitrary" method.
- 27-4 See Response 12-5.
- 27-5 Enforcement of the restrictions to prevent resource damage as stated is the key to this plan. See Response 12-5.
- 27-6 If any development is proposed in the RUZ, the proposal will have to conform to the constraints outlined in the Management Plan. The designation of the RUZ as an ACEC will add additional constraints to surface disturbance caused by mineral development as per 43 CFR 3809.1-4(3).

COMMENT LETTER #27 continued - RESPONSES

- 27-7 See Response 17-2(b)
- 27-8 Please note that 100% of the Verbena is to be protected.
- 27-9 See "Dear Reviewer" letter.
- 27-10 Under the proposed action no specific action, like fencing, is needed to protect the candidate species. However, we would consider fencing if provided with site specific recommendations.
- 27-11 The recreational uses that the MFP proposes to emphasize are: limited ORV use, target shooting, picnicking and viewing spring wildflower displays (MFP 1 - recommendation #5).
- 27-12 See Response 17-2(a) and 27-10.

TABLE 1

	Restricted Use Zone	Intensive Use Zone
Proposed Action	63% (5%) 224 acres	37% (20%) 525 acres
Maximum Use Alternative	52% (10%) 369 acres	48% (25%) 852 acres
Minimum Use Alternative	63% (2%) 89 acres	37% (10%) 262 acres

63% public land within Red Hills
 (5%) surficial disturbance permitter
 224 acres potential acreage surficially disturbed

COMMENT LETTER #28

6415 Regent Street
Oakland, Ca 94618
16 April 1984

Deane Swickard, Area Manager
Folsom Resource Area - BLM
63 Natoma Street
Folsom, California 95630

Re: Draft Red Hills Management Plan & Environmental Assessment

Dear Mr. Swickard:

Thank you for the opportunity to see and comment on this document, which endeavors to reconcile several conflicting interests. The introductory nine pages setting forth the objectives of the plan, the constraints under which it was formulated, and the various actions of the proposed alternative are clearly stated. For the most part the objectives agree fairly well with my own. Whether or not they will be attained under the proposed actions is another matter.

Picking an appropriate path among the demands of the various pressure groups wanting a slice of the Red Hills pie is an unenviable position to be in. Yet I believe that BLM has itself exacerbated the difficulties of its position. I have it on good authority that BLM itself reached out to ORV groups to advise them of the availability of the Red Hills for their pursuits several years ago. In the absence of effective law-enforcement ability, some areas of the Red Hills have since increasingly tended toward a de facto "open" zone. Indiscriminate shooting and garbage dumping will be harder to stop by virtue of being so well entrenched. An application under the Recreation and Public Purposes Act has been approved and at least one more is expected.

Are these activities appropriate for an area with the unique characteristics of the Red Hills? I believe the evidence is overwhelmingly that they are not and that BLM should have known this and early made it clear to interest groups that management ground rules dictated against such uses. It is a mistake to apply the principles of multiple-use to every square foot of public land; some tracts should be managed preeminently to conserve the special natural resources found thereon. Congress's intent that this should be the case seems clear enough in the phraseology of the Federal Land Policy and Management Act (FLPMA) of 1976 (Sec. 103(a)), wherein Areas of Critical Environmental Concern (ACEC) are defined as being "to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards". Their identification and protection were specifically to be given priority in the planning process and in formulating management rules.

What are the special attributes of the Red Hills? They are only sketchily and incompletely set forth in Chapter 3 of the document (the EA portion as a whole is quite inadequate). There are at least five rare species of

plants, four of which are confined or nearly so to the Red Hills, and rare soils. There are--or were--wildflower displays surpassing, in the judgment of many distinguished field botanists, those visible anywhere else in California and recognized as noteworthy on an international basis. Eagles roost in winter on portions of the Red Hills near Don Pedro Reservoir. All these facts have been extensively commented upon by botanists, soil scientists, and environmentalists going back to before ORV use and shooting had become so entrenched and prior to proposals that these activities be officially sanctioned. These environmental attributes have been the basis for the U.S. Fish and Wildlife Service's desire for preserve status for the southern portion of the Red Hills.

That the Red Hills--in their entirety--would qualify for designation as an ACEC seems clear from FLPMA. While we would agree with the area manager (pers. comm.) that development is not precluded within an ACEC, we do not agree that the positive statement contained in FLPMA can be distorted into a negative one: that it "was not the intent (of Congress that designation as an ACEC should) preclude development". Rather, Congress said that any development must meet the proviso that "the important environmental resources within that area, or human property or lives, are not damaged or endangered" (emphasis added). The integrity of the resources, not the allowability of development, was the focus of Congress's concern.

28-1 The draft management plan conveys a clear sense of a hidden agenda directed at development activities. E.g., "All discretionary proposals that will cause surface disturbance..." (p. 3); "Specific stipulations will be developed for each Project Environmental Assessment." (p. 3); "...limit cumulative surface disturbance to a maximum of 5 percent..." (p. 4); several allusions to "discretionary surface disturbance" (pp. 4, 5); and references to grazing, mining, military maneuvers, shooting ranges, ORV activity, R&PP leases, etc.

28-2 Indeed, it is common knowledge that an elaborate shooting complex has been proposed for the southwestern portion of the Red Hills, a portion previously promised by BLM to the Fish and Wildlife Service as for preserve status. This shooting complex is vaguely hinted at on pg. 26, but details of the proposal have been withheld from the public by BLM on the grounds that a formal application has not been received for use of the land. Nevertheless, copies of most of the related documents have been obtainable from other sources. As conceived, even if somewhat watered down, it would affect major portions of rare plant habitat. The proposal must be viewed in the knowledge that BLM considers only the firing and target lines to fall within its arbitrary figures limiting "discretionary surface disturbance", not the intervening land (pers. comm.), and that the proponents feel they "can live with (a figure of) 5 percent" (pers. comm.). This would be the third shooting facility existing or proposed for the Red Hills. The arbitrary 5 percent figure would allow 225 acres of actual disturbance; under BLM's ground rules, a much greater area could actually be occupied.

28-3

While nomination of the southern portion of the Red Hills as an ACEC is a step in the right direction under FLPMA, given the proposed management rules and the rather obvious goal of accommodating a shooting complex within the ACEC to the point that rare plant habitat will be affected

- 28-4 (admitted in the estimates in the plan of how much habitat for each species will be protected) and that only a small part of the area proposed for protection of rare soils would be accommodated in the chosen alternative, the protection to be afforded by this designations is plainly insufficient.
- 28-5 BLM has had an agreement with the Fish & Wildlife Service to establish a preserve in the entire southern portion of the Red Hills and its has a public trust responsibility, reaffirmed as recently as 18 March 1983 by publication in the Federal Register, to protect the unusual natural resources in the Red Hills. Instead, it apparently contemplates nibbling away at them. Yet on p. 4 of BLM's own ACEC Policy and Guidelines manual is found the statement that "In addition to protecting important environmental resources from damage or loss, whenever feasible the purposes of this special management attention are to affirmatively enhance such resources".

In view of the statutory requirement that lands of "national significance" not be subject to leasing under the Recreation and Public Purposes Act (R&PP), both the contemplated shooting complex in the southern portion of the Red Hills and the already granted lease on Taylor Hill (which also involves rare plant habitat and is also to accommodate shooting) would seem of very dubious legality. Statements made by the area manager (pers. comm.) seem to indicate that leasing is an initial step toward conveyance of title ("disposing") to the lessee and, in fact, that lands to be leased must first be found suitable for disposal. Such a judgment appears to have been made for the Taylor Hill lease (p. 21, Land Report, 1981) despite the fact that very significant rare plant habitat occurs within the lease and that apparently no definitive rare plant survey was conducted prior to its issuance. Indeed, BLM is only currently undertaking one for its lands in the Red Hills. Development plans for the Taylor Hill lease call for significant levels of alteration of the natural surface of the land. No public hearing was held on issuance of the lease; regulations do not require one when only 200 acres are involved.

- 28-6 I would like clarification of BLM policy or regulations in regard to eventual disposition of leased land. I find no legal mandate that leased land must eventually be disposed of. If there is such a requirement or intent, a shooting facility on either Taylor Hill or in the southern portion of the Red Hills becomes even more objectionable because it involves a "give-away" of habitat for rare species.

- 28-7 As for the matter of preserving the unusual scenic resources and the seasonal wildflower displays that have been so striking as to have attracted international appreciation, preservation of a 100-yard corridor on each side of the road makes a travesty of the stated purpose of an ACEC.

- 28-8 Under the proposed alternative with the intent of accommodating the shooting complex, human use would dramatically increase in the proposed ACEC and surface disturbance would take place that would quite likely during construction exceed the limits of just firing and target lines suggested by BLM. Parking facilities for a total of 814 cars, a campground, a lagoon, a manager's residence and several shooting facilities appear in the plan submitted to BLM on behalf of the Red Hills Sportsmen Association on 2 September 1983.

- We wonder how extensive will be the surface disturbance associated with construction of leach lines from septic tanks to service the sanitary needs of the anticipated numbers of people. We wonder at the development of water resources needed to serve all these visitors, with or without a lagoon. Tapping either the groundwater or surface water supplies for the quantities needed, via wells, reservoirs, or whatever, will surely affect the hydrological regimen that now supports the plants, including one of the rare ones, dependent upon watercourses. Perhaps such effects are anticipated, for animal life, by the proposal to add "guzzlers", an idea that seems otherwise superfluous for the now resident fauna. We wonder what will be the effect on frequency of fire, noting that 16 of the 18 fires in the Red Hills since 1960 seem to have been of unnatural origin (pers. comm.), including instances where shooting, vehicles, and cooking or campfires were responsible. We note with interest that surface disturbance necessary to suppress fires would not be included in the limiting figure of 5 percent "discretionary surface disturbance" (BLM to Environmental Defense Fund, March 1984).
- 28-9
- 28-10
- 28-11
- 28-12
- 28-13
- 28-14
- 28-15
- No mention is made of how protection of rare plants is to be accomplished, either for the Intensive Use Zone (IUZ), where surface disturbance is supposedly to be limited to 20 percent and habitat for rare plants will be protected at levels ranging according to species from 90 percent to 100 percent, or for the Restricted Use Zone (RUZ), where the ACEC is proposed and where the comparable figures are 5 percent and 95 to 100 percent. Yet these figures appear with the difficult to fathom parenthetical statement "estimate to be obtained from sensitive plant contract". This again speaks to the obvious intent to accommodate development within habitat for rare species by sacrificing some of that habitat, as well as to the peculiar planning agenda whereby decisions are being made before basic information is available. The mere intent to sacrifice some of the habitat seems quite out of line with statutory and regulatory mandates.
- BLM's oft-encountered goal "to ensure that...official listing is unnecessary" in relation to rare species is difficult to understand. Formal listing would seem to bring increased likelihood of funding to carry out protective measures. Certainly it poses no additional threats to the species. Listing is supposed to be based on biological information, not on whether or not the land-management agency feels its good intentions are being questioned or its practices faulted. With the very limited distribution of the rare plants at issue and the intensive and destructive human uses taking place in the Red Hills, combined with proposals that would destroy nearby privately owned habitat, the plants seem more than qualified for listing even should BLM's protective capabilities be much more certain of complete success than they are.
- It is unclear whether formal designation of the IUZ for ORV use has occurred to date; apparently not. An informal staging area first utilized several years ago has obliterated a flowery field and "existing roads and trails", to which ORVs are in theory confined, keep expanding. Without someone with law enforcement power constantly on the scene, "existing" roads and trails will keep spreading; once traversed they become "existing". Obviously not even the sheriff under a cooperative agreement can provide continuous presence. ORV use should not occur in rare plant habitat.

28-16

Apparently BLM believes 110 acres total of unique soils are "sufficient" (objective 3) for future study and preservation. World-renowned soil scientist Dr. Hans Jenny provided BLM with a list of parcels to be preserved totaling 980 acres, in addition to the then-proposed preserve in the southeastern portion of the Red Hills. BLM has claimed (pers. comm.) that the 110 acres in the proposed alternative were selected in a phone conversation by Dr. Jenny as the most important of the 980. Dr. Jenny denies this. In his original letter he set forth criteria emphasizing different kinds of soil, slope gradations varying from level to steep, and systematic exposure patterns around an isolated hill or mountain. The few parcels retained by BLM in the proposed alternative do not in isolation fulfill these criteria. What they do seem to meet in the way of a criterion is that of interfering as little as possible with some version of that elaborate shooting complex.

Another planning objective is to protect the roosting habitat of the bald eagles near Don Pedro Reservoir. One wonders, though, how all the shooting and human activity planned a mile or so distant will affect the eagles.

In sum, the proposed alternative and some prior actions seem based on poorly founded optimism, a hidden agenda, a unilateral disregard of a prior agreement with the U.S. Fish and Wildlife Service, and an imperfect understanding of BLM's duties and responsibilities as a public trust agency under FLPMA, the R&PP Act, and agency regulations. I believe a great deal of revisionary work is needed on the draft plan and EA. I regret the need to say these things so bluntly, but there has been a long history in the planning process of disregarding both the unique natural resources of the Red Hills and their spokesmen. Rare plants, rare soils, and striking wildflower displays cannot be moved elsewhere. Shooting facilities, ORV areas, places for military maneuvers, and the like can.

Sincerely,

Alice Q. Howard

Alice Q. Howard

- 28-1 We did not intend to convey a "hidden agenda". The OBJECTIVES of the Management Plan were meant to resolve identified issues (clearly stated on pages 2 and 3). All PLANNED ACTIONS are designed to meet the OBJECTIVES of the Plan (also clearly stated on pages 4 and 5).
- 28-2 We receive countless preliminary proposals daily, ranging from christmas tree farms to leases for community colleges. It is not our policy to inform the public on all preliminary proposals.
- 28-3 See Response 27-3.
- 28-4 See Response 17-2(a).
- 28-5 There is an agreement between the BLM and USFWS to develop a habitat management plan for the Red Hills Management Area and to close the south half to ORV activity. There is not an agreement between the BLM and USFWS to establish a "preserve" for the entire southern portion.

COMMENT LETTER #28 continued - RESPONSES

- 28-5 We assume you are referring to 48 FR 11642, 18 March 1983, which is the Department's updated Fish and Wildlife Policy on State-Federal relationships. The major purpose of the updated Federal Register notice is reaffirming the Department of the Interior's desire to continue seeking new opportunities to foster a "good Neighbor" policy with the States.
- 28-6 The Bureau has no legal mandate or requirement to eventually dispose of land leased under the Recreation and Public Purposes (R&PP) Act. Regulations relating to disposal or retention of leased land and the R&PP Act in general can be found in 43 CFR 2430.4, 2912, and 2741.
- 28-7 See Response 12-4.
- 28-8 See Response 17-2(b) and 28-1.
- 28-9 The construction of wildlife guzzlers is intended to meet OBJECTIVE #6, page 3. It has nothing to do with any other proposed activities in the Management Area.
- 28-10 Surface disturbances caused by wildfire suppression will be added toward the cumulative allowable disturbance in the Management Area.
- 28-11 Sensitive plants in the Management Area are to be protected by (1) signing riparian habitat near major roads, (2) limiting ORV activity to designated roads and trails, (3) prohibiting additional grazing leases, (4) development of Modified Suppression Plan, (5) constraints placed on discretionary surface disturbance, and (6) fencing 40-acre parcel in T. 1 S., R. 13 E., section 1.
- 28-12 For example, the rare plant study gives an approximate estimate of at least 380,934 *cholorogalum* plants in the IUZ. Alternative 1 calls for protecting 90 percent of the population or 342,841 plants from discretionary surface disturbances.
- 28-13 The BLM has no legal or regulatory requirement to protect every individual of a non-listed sensitive species. However, it is the State Director's policy to ensure that the existence of any sensitive species population is not jeopardized so that official listing is unnecessary.
- 28-14 The official process of listing species as Endangered or Threatened is a function of the USFWS.
- 28-15 There has been no formal designation of the IUZ or RUZ for ORV use.
- 28-16 These 110 acres were selected by Dr. Jenny during a phone conversation with this office on December 13, 1983. Dr. Jenny was asked, "if a specific 100 acres of soil could be fully protected, where would he like to see them?" The parcels he indicated are those shown in Alternative 1. Even though only 110 acres are specifically identified, 6,355 acres (90% of the Management Area) will be protected from surface disturbance and should meet OBJECTIVE 3.

326 Severin Ave
Modesto, CA 95354
April 15, 1984

COMMENT LETTER #29

Mr. D. K. Swickard
Bureau Land Management
63 Natoma St.
Folsom, CA 95630

Dear Mr. Swickard:

I am encouraged by the fact that your office is finally preparing a management plan for the Red Hills Area. The Red Hills present unique and valuable educational and recreational opportunities to valley and foothill residents. However, the area is suffering from unrestricted, damaging forms of activities, and needs some regulation.

With regard to the BLM proposed Red Hills Management Plan, I strongly favor Alternative 3, but with several serious reservations. Specifically:

29-1 a) The off-road vehicle area should be reduced in size, and restricted to the area north of Red Hills Road. Twenty-three hundred acres is just too much land to be set aside for that purpose, especially considering the closeness and availability of other ORV areas - like LaGrange Regional Park and Del Puerto Canyon. The present ORV use is seriously degrading the habitats of several
29-2 rare plants - such as the Bitterroot populations on the south side of Red Hills Road.

29-3 b) No shooting range in the proposed ACEC!
The noise and disturbances caused by a large shooting range (even a well-run one) are incompatible with hiking, bird-watching, wildflower enjoyment, and family outings - the kinds of activities pursued in the relatively pristine and undamaged southern half of the Red Hills. Please, keep all the noisy and

disturbing activities restricted to one area. Allow a small shooting range in the north half of the Red Hills, if necessary. It seems ridiculous to use an area of unusual natural vegetation for a shooting range, when there are thousands of acres of already disturbed grazing land throughout the valley and foothills that the NRA could buy or lease for such purposes.

- 29-4 | c) There must be stronger provisions for enforcement of regulations, and prevention of vandalism and littering. Fences, gates, and signs should be installed to protect sensitive habitats; litter laws should be enforced. There is no reason why a small, abusive group of users should be allowed to thoroughly trash-out and despoil a public area. A strong law enforcement presence will be essential during the transition from unregulated to restricted use.

You have the support and encouragement of many Californians in your efforts to devise a plan that provides for protection and enjoyment of this unique and beautiful area. Thank you for your efforts on our behalf.

29-1 See Response 17-18.

29-2 See Response 17-11.

See the discussion of sensitive plants on page 24.

29-3 See Response 17-2(b)

29-4 See Response 6-2

Sincerely,

Tommi Lou Carosella

April 17, 198

Mrs. Diane Siskard, Area Manager
Bureau of Land Management
63 Natoma Street
Tolson, Ca. 95630

Dear Sir:

Along with a multitude of C.N.P.S. members and other nature lovers, I wish to urge that our beloved Red Hills area receive proper management for the enjoyment of those who care enough to drive through and feast their eyes. The present conditions are more of a famine than a feast.

We were on the April 7 trip with the N.M. and the carpet of broken glass, the leaf-littered and downed Jeffrey Pines, the litter and eroded hills made us all nervous.

Our proposed "new area" (P.D.) is beautiful, but what only remains is a designated A.C.E.C. per Mearns' proposal of 100 yards of a scenic corridor along the existing Red Hill Road is absolutely needed for beauty lovers.

By increasing signs and fences, perhaps the "Mearns' idea" can be discouraged even a little. I'd like to see you say it all and I agree with everything in it.

Sincerely,
(Mary Ann) Morris and Leabell
10666 Dixon Road
Oakdale, Ca. 95361

30-1 See Response 12-4.



YOKUTS GROUP

MOTHER LODGE CHAPTER -- SIERRA CLUB

April 16, 1984

COMMENT LETTER #31

D. K. Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

Dear Mr. Swickard:

Thank you for the opportunity to comment on the Red Hills Management Plan. The increase of damage and destruction of soils, plants and property that I have observed during my visits to the Red Hills over the past twelve years is disconcerting. Your efforts to finally achieve some order and protection for this unique area are appreciated.

The Red Hills area offers many uses to the Yokuts Group members including wildflower enjoyment, bird watching and foothill hiking and picnicking. Its close proximity to Modesto makes it especially accessible to our group. We favor placing these lands into a status that allows us, and others, to pursue these activities without the constant threat and disturbance posed by irresponsible gunmen and off-road vehicle operators currently using this area. Their use (abuse!) has resulted in severe littering of the area, eroding of the hillsides, and damage and destruction of Digger Pines with gunshot.

Because I recognize a growing interest in off-road vehicle use and riflery, I have left room in our recommendations for these activities to occur in a minimally-destructive way. Of the four, the group's interests are best approximated by Alternative 3. We propose the following revisions to the plan.

- | | |
|------|---|
| 31-1 | 1) Reduce the IUZ by eliminating its designation in Sections 16, 19, and 20 and Section 17 and 18 south of Red Hills Road. Change these to RUZ, thereby restricting ORV and firearms use in these areas. Red Hills Road seems a logical dividing line for these zones and allows for easy "drive-thru" enforcement. |
| 31-2 | 2) Extend a 200 yard scenic corridor along the entire length of Red Hills Road on the north (the IUZ) excluding <u>fenced</u> staging areas, shooting areas or access roads. |
| 31-3 | 3) Create some "shooting only" areas along Red Hills Road on the north (the IUZ) to allow this activity to occur in an ordered and safe fashion. Keep these areas clustered together |



INVOLVING SIERRA CLUB MEMBERS IN STANISLAUS AND TUOLUMNE COUNTIES, CALIFORNIA

- 31-4 | 4). Allow an ORV "free play" area in the southern half of Section 18 (north of Red Hills Road) with a clear understanding that this is the only "free play" area and that all other areas are limited to existing roads and trails.
- 31-5 | 5) Erect signs and fences throughout to inform all visitors of these designations.
- 31-6 | 6) Allow less than 1% soil surface disturbance in ACEC rather than the 5% proposed.
- 31-7 | 7) Monitor the resource area on the ground annually for soil disturbance, vegetation disruption, sensitive plant impact and resource degradation.
- 31-8 | 8) Arrange for uniformed law enforcement officials to frequently patrol the area and cite violators, at least, until the situation has improved. Perhaps only occasional patrols will be necessary thereafter.
- 31-9 | 9) Complete the Environmental Assessment; listing all plants, mammals, birds, amphibians, reptiles, and fishes occurring in the area and their significance in the Red Hills ecosystems.

Recommendations for immediate implementation:

- 31-10 | 1) Place signs in the southern end restricting ORV use and signs in the north pointing out existing ORV roads and trails;
- 31-10 | 2) Place "No Dumping" signs at all entrances to the area;
- 31-10 | 3) Place "No Shooting" signs south of Red Hills Road;
- 31-11 | 4) Fence and sign the NE corner of Section 19, T18, R14E to protect the unique plants and the creek drainage there, and;
- 31-12 | 5) Make immediate arrangements for law-enforcement patrol in this area.

I sincerely hope these comments will be helpful in the creation of a final plan. Thank you again for the opportunity to respond to this important issue.

- 31-13 | Our group would like to offer its assistance in monitoring and inventorying the area for environmental impact.

Sincerely,

Donna Durham

Donna Durham
Chairman

COMMENT LETTER #31 continued - RESPONSES

- 31-1 This is impractical and unenforceable.
- 31-2 See Response 12-4.
- 31-3 We have closed 1/4 mile on either side of Red Hills Road to indiscriminate shooting, except at a designated shooting area (see Federal Register 49:20945, May 17, 1984).
- 31-4 See Response 17-8.
- 31-5 See Response 5-1, Planned Actions D. 7, 16, 17 on pages 5 and 6 of the Management Plan, and "Dear Reviewer" letter.
- 31-6 See Response 17-2(a).
- 31-7 See Response 12-5.
- 31-8 See Response 6-2 and 17-7.
- 31-9 See Response 17-4.
- 31-10 See "Dear Reviewer" letter.
- 31-11 See Response 17-11.
- 31-12 See Response 17-7.
- 31-13 See Response 12-10.



COLLEGE OF NATURAL RESOURCES
DEPARTMENT OF PLANT AND SOIL BIOLOGY

108 HILGARD HALL
BERKELEY, CALIFORNIA 94720

COMMENT LETTER #32

April 16, 1984

Mr. D.K. Swickard
Area Manager, BLM
63 Natoma Street
Folsom, CA 95630

Dear Deane:

Thank you for sending me a copy of the Red Hills Management Plan. I enclose my comments, hoping that they will assist you in reaching a balanced decision.

Foremost I commend you on the text's emphasis on the significance of soil and its protection, and placing soil on par with the preservation of plants and animals. I believe that in this Plan BLM is setting a new course in its appreciation of soil as an important national resource and as a deserving object of present day and future scientific research. In this light I am offering the following comments.

1. Impact of ORV activities. I don't know how the area of impact was computed. From the point of view of soil the affected area is considerably larger than the sum of the visible track areas. The rills and grooves carved and compacted and the surface soil pushed sideways change laterally the soil water household over a distance of several feet. It modifies soil moisture, increasing it in a given small area and decreasing it in an adjacent one. The alteration disturbs the beneficial, aggregate-forming functions of the soil invertebrates, and the nitrifying and denitrifying processes of soil microbes that control plant growth. Our Department of Plant and Soil Biology is intensely studying these chemical reactions. Further, as the Plan points out, the recreational activities cause erosion but it is not mentioned that most of the eroded soil material will be deposited within the watersheds of the Red Hills, thereby enlarging the area of soil disturbance. Some of these outwash deposit areas may soon be hidden by new ground vegetation but the

32-1

32-1 | damage to the soil profile will persist for decades and centuries.
It interferes with soil research.

32-2 | 2. Rifle range. It is clear that the sharp shooters won't
significantly disrupt the soil mantle directly, but the trees will
have to be cut and that operation changes the vegetation cover
sufficiently to upset the soil-input of organic matter and the
biological decomposition rates of soil humus. The natural soil will
deteriorate rather rapidly. If the logs are pulled out with tractors
disturbance of the surface soil will be extensive.

3. Ecosystem. On page 23 of the Plan the word ecosystem appears.
I wish this concept had received more attention in the write-up. It
combines plants, animals and soils as a landscape element and thereby
fosters a unified approach to management. Much is made in the text -
correctly so - of rare and endangered species, but Red Hills contains
rare and endangered communities as well, and my proposed soil areas
take this diversity of ecosystems into account.

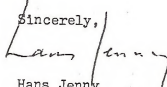
32-3 | In this connection page 43 defines "long term" as a period of
20 years. Does this imply that after 20 years the Red Hills are
open for grabs or re-assessment and further curtailment of protected
areas? As you may remember, my long-term time spans embrace centuries
and millennia, which offers entirely different perspectives to a
management plan. And though my time scale is presently still in the
clouds it will become tangible in due time.

4. Minimum use plan (Alternative 3, Map 7). I appreciate that you put
all my requested soil areas of about 1000 acres on this map. It
will serve as a document for discussions in the future.

32-4 | 5. Maximum use plan (Alternative 2, Map 5). I am astonished that the
entire soil request has been reduced to a measly 40 acres, traversed
by a winding road, situated at the foot of a camp ground and
recreation area, with few level areas and no substantial continuous
body of the unique Delpiedra soil series, that symbol of the Red Hills.

6. Proposed action (Alternative 1, Map 3). The requested soil area
has been reduced from about 1000 to 110 acres as three widely
separated small parcels, or to 70 acres if the questionable parcel
at the entrance to the rifle range is not counted. You indicate that
I approved this choice in a telephone conversation last December,
presumably with Mr. Rey Farve. However, I don't remember the details.

- 32-5 These small areas are not conducive to much scientific experiments that would include fertilizer trials, plantings and silvicultural operations. While these soil sites may be preserved for the "long-term" of 20 years they might not survive the life spans of my grandchildren.

Sincerely,

Hans Jenny
Professor Emeritus

- 32-1 We considered on the average, roads and trails to be seven feet wide. Therefore, 1 mile of road or trail is disturbing 1.2 acres of surface. If a more scientific means of evaluating the impacted area exists, we will certainly consider applying it to compute the existing disturbance.
- 32-2 See Response 17-2(b).
- 32-3 See EVALUATIONS AND REVISIONS, page 9. The 20-year figure is used for general assessment purposes to evaluate the long-term impacts of an action.
- 32-4 Even though only 40 acres are specifically identified, 5,880 acres would be protected from surface disturbance in the Management Area. There is no campground or recreation area at this location.
- 32-5 See Response 28-16.

April 16, 1984

D. K. Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

Dear Mr. Swickark,

As a Tuolumne County resident I feel that the Red Hills area is my own special wildflower garden and biological area. I am truly grateful for being able to live so near.

I participated in the April 7th wildflower trip led by Joe Medeiros and was especially delighted with all the wildflowers. Of particular significance were Lewisia rediviva, Allium craterricola, A. sanbornii var. Tuolumnense, Streptanthus polygaloides and Mimulus douglasii which are trying hard to survive in an area where there is considerable ORV abuse as well as all kinds of human litter and garbage. (The area had been cleaned up only 2½ months previous to our trip, yet there was litter everywhere.)

33-1 I would like to see a scenic corridor of 100 yard width on each side of Red Hills Road for its entire length excluding the fenced staging areas, shooting ranges or access roads.

33-2 I would like to see area south of Red Hills Road protected so that no ORVs, no dumping or shooting would occur in that area. This would protect many special species of flowers, animals and the serpentine soil. Those of us who wish to enjoy by looking and photographing plants and wildlife would be safe. (The amount of land in IUZ would have to be reduced to properly protect this area.)

33-3 I would like to see signs and enforcement of the sign messages by continuous patrol by law enforcement officers. A plane overheard every year or so will not control ORV use and/or excessive and unsafe gun use.

33-4 Please locate the rifle range proposed by the Red Hills Sportsman Assn. in the northern(RUZ) area---and north of Red Hills Road. This would concentrate all the shooting, noise and danger from guns in one area. This would also restrict traffic in the southern(RUZ) area and leave it in a more pristine setting.

If all of the above requests could not be enacted I would hope that Alternative Plan #3(minimum use) would be the choice.

Thank you for your time. Sorry you were not with us on the great field trip.

- 33-1 See Response 12-4.
33-2 See Response 12-4.
33-3 See Response 6-1, 6-2 and 17-7.
33-4 See Response 17-2(b).

Sincerely,

Tip of Red Hill

NORTHWEST CALIFORNIA
SANTA CLARA CO. CA.
FOLSOM, CA 95630



MINERALS EXPLORATION COALITION

Minerals Advocate
In Public Policy

12640 West Cedar Drive
P.O. Box 15638
Denver, Colorado 80215
303/989-5567

COMMENT LETTER #34

April 17, 1984

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D. K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95630

Re: Red Hills Management Plan and Environmental Assessment

Dear Mr. Swickard:

This letter constitutes the comments of the Minerals Exploration Coalition on the Red Hills Management Plan and Environmental Assessment. We would like to thank you for the opportunity to present our views on this issue.

Because the Red Hills area is to be designated an Area of Critical Environmental Concern (ACEC), mineral development could be constrained and all mining activities (other than casual use) would require an approved plan of operations. Our main concern is that not all of the identified alternatives (Proposed Action, Maximum Use, Minimum Use, and No Action) discuss the issue of management of mineral potential and no provision is made for management of exploration (not even in Maximum Use alternative) if it were to occur. The management plans seem to be slanted heavily toward protection of ecological systems and recognition of other multiple-use options seems to be minimized.

Sincerely,

John D. Wells
President

JDW:MAN

34-1 As there is limited mineral potential in the area, we felt no need to address management of this resource.

34-1

COMMENT LETTER #35

649 Geer Ct.
Modesto, CA 95354
April 17, 1984

Red Hills Management Plan
D. K. Swickard, Area Manager
Bureau of Land Management
63 Natoma St.
Folsom, CA 95630

Dear Mr. Swickard:

I am writing to you about the Red Hills Management plan and Environmental Assessment (Draft of January 20, 1984) on behalf of the Stanislaus Audubon Society, SAS.

The SAS favors Alternate 3, the minimum use plan. The major reasons for favoring Alternate 3 are:

- 35-1 |
1. The sound of rifles on the rifle range will disturb the bald eagles in their roosting areas.
 2. Alternatives 1 and 2 do not provide sufficient protection for the five plant species that are candidates for the endangered and/or threatened species classification.

Yours truly,

John Potter
Red Hills Chairperson
Stanislaus Audubon Society

35-1 See Response 17-2(b).

COMMENT LETTER #36

Mr. Deane Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, Ca 95630

April 17, 1984

Subject: Red Hills Management Plan & Draft Environmental Assessment

Mr. Swickard:

I am writing you to offer my comments on the proposed Red Hills Management Plan. I have just finished reviewing the entire plan. First of all, I want to thank you for developing the management plan in response to public interest in the Red Hills area. As the document points out, the selected alternative must use coordinated resource management to address identified issues. The sensitive nature of the Red Hills natural resources makes management policy decisions especially important.

On my most recent trip into the Red Hills, on April 7th of this year with CNPS members, I was again shocked at the lack of control and resulting impacts to natural resources. It was difficult to carry on conversation due to the roar of dirt bikes and firearms. It was especially uncomfortable to hear indiscriminate rifle fire nearby when there were children wandering around. The ground along Red Hill Road at several locations was completely covered with broken glass and entire mature Digger Pines have been "shot down" by continual target practice. These areas also contain several rare or unusual plants including Lewisia rediviva and Allium sanbornii var. tuolumense. This outing provided a disgusting summary of the current problems within the Red Hills. Unfortunately, the proposed management alternatives do not assure correction for these existing problems.

36-1

The known impacts resulting from uncontrolled use of the Red Hills area for recreation combined with the absence of good scientific information on the status of the rare plants and their associated habitats require that use be minimized in the area until resource recovery, and better information is available for sound management. Only Alternative 3, Minimum use, approaches this requirement. The other alternatives would either encourage sensitive plant and resource destruction or would only redirect it somewhat.

Of the 9 Plan objectives identified in the document, 8 involve resource protection and enhancement. However, 3 of the 4 plan alternatives offered would cause measurable impact on the 5 known sensitive species and turn over large tracts of land to intensive use without guarantee of rare plant and resource protection. Each of the alternatives, with the possible exception of number 3, involves resource trade-offs without full consideration of impacts. The proposed action, Alternative 1, makes a number of management decisions affecting rare plants before carrying out the proposed sensitive plant study to determine population estimates. This is not good management practice and is

COMMENT LETTER #36 continued

not otherwise warranted by the issues. The sensitive plant study is necessary ~~before~~ allowing any impact to those species. The percent of total area included in particular classification is not necessarily a good indication of resource impact. Intensive use should be limited to only those areas designated on the basis of resource compatibility. The unique soil of the Red Hills should be protected to the maximum extent possible. There are many research possibilities that can best be encouraged by preserving that resource. So far, field work has mainly focused on the unusual plant associations but insect and wildlife species may also include species uniquely adapted to the stressed environment in the Red Hills.

BLM has not done an adequate job of examining the flora and fauna of the Red Hills, and the agency should be encouraging more independent research there. The species lists were very inadequate for wildlife and the plant list was inaccurate. There is better information available for plants in the Red Hills and it is not reassuring to see so many errors in the plant species list when these same species are such an important part of the management plan. The list of preparers indicates that a botanist was not directly involved in preparing the plan. This seems to contradict the intent to protect sensitive plant species.

The plan includes a number of incompatible features. A significant one, the location of a regionally important shooting range adjacent to a restricted use zone, would degrade the outdoor experience of other visitors. The range would generate considerable but unquantified users and the noise would conflict with aesthetic values. There are other areas suitable for a shooting range and every effort should be made to place ORV and shooting activities in the same area to minimize noise impacts and localize noise occurrence.

I would like to propose an inter-agency/citizens advisory committee to oversee actions potentially affecting sensitive plant species in the Red Hills. I would be happy to volunteer time to serve in this capacity. The group could provide a true interdisciplinary effort for resource management of the sensitive species. One concern needing consideration is the importance of genetic exchange between scattered populations in the Red Hills area. This could be an important factor in species adaptation to the stressful soil conditions.

The Management Plan has a number of flaws keeping it from being an effective resource management document. The difficult task of providing effective enforcement for controlling activities after years of indiscriminant use is a critical part of the plan. The document is not clear how protection would be provided. It is important to be conservative in weighing decisions based on enforcement without a guarantee of effectiveness. Much more emphasis should be given in the final document to sensitive plant preservation, natural resource research and recovery, and protection measures.

I have carried out a number of studies in the central Sierra Nevada foothills over the last 4 years as a District Biologist for Caltrans. In that time, I have become increasingly aware of

COMMENT LETTER #36 continued

the unique soils and associated plant communities in the Red Hills area of Tuolumne and Mariposa counties. I have worked with a number of rare plants found in foothill habitats and feel that few if any are as sensitive as Red Hills species to impacts resulting from public land management decisions. I look forward to continuing to participate in the development of a sound management plan for the Red Hills resources.

Sincerely,

Dale T. Steele

Dale T. Steele
1316 N. Harrison St.
Stockton, Ca 95203
(209) 462-5221

36-1 See Response 27-2.

36-2 See Response 17-4.

36-3 See Response 17-2(b).

36-4 See Response 12-10.

36-5 See Response 6-2.

17 April 84 .

Dear Mr. Swickard,

I have visited the Red Hills many times to enjoy the abundant and unusual wildflower display. The lack of a strict management plan however makes the enjoyment of nature difficult, due to the frequent distractions of broken glass, cans, trash, shooting, and off-road vehicles.

Of your current alternatives for a management plan, I ~~would~~ support #3 - Minimum use. To me the preservation of the flora in the area is more important than the use of the area for wanton shooting, ORV's, and garbage dumping. Due to the incompatibility of these uses, I think that at the very least they should be separated by Red Hills Road.

- 37-1 Shooting and ORV's should be restricted to the Northern side of Red Hills Road only. Also
- 37-2 I feel that enforcement of the law by giving out citations should be carried out until people realize that there are rules in the area.

Another reason to keep the intensive use of the Red Hills to a minimum if it is allowed at all is that an ORV area already exists in the La Grange area which is located only 5 or 10 miles away.

Please preserve the unusual terrain and the wonderful wildlife collection in the Red Hills for all of us to enjoy by making it a Minimum Use area.

Sincerely, Betty Lou Doern
1517 Rose Ave
Modesto, 95355

37-1 See Response 31-1.

37-2 See Response 6-2 and 17-7.

UNIVERSITY OF CALIFORNIA, BERKELEY

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SANTA BARBARA • SANTA CRUZ

COMMENT LETTER #38

JEPSON HERBARIUM
DEPARTMENT OF BOTANY

BERKELEY, CALIFORNIA 94720

April 18, 1984

D. K. Swickard, Area Manager
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95630

Dear Mr. Swickard:

I have written previously to express concern for full protection of the natural resources at Red Hills, particularly the sensitive plant species and wildflower displays that are becoming so scarce in California. The devastation of our native plant species in the past 50 years should result in giving highest priority to saving some bit of our heritage on our public lands. Why must we spend so much time trying to think of ways further to destroy our natural lands? It is my understanding that Congress has passed legislation to encourage preservation of natural wild-lands.

Your draft of the Red Hills Management Plan and Environmental Assessment is at hand and I wish again to ask that full protection be given to this unique area. Alternative 3 (minimum use) would be my choice if only the four presented are possible. I do have some questions on the draft plan.

38-1 I do not understand why it is only now that there is to be a rare plant study to determine distribution and densities of sensitive plant species. Isn't your contract study coming very late or your draft plan premature? Should not planning be based on the data to come from the plant study?

38-2 The vague statement at the top of p. 26 concerning the shooting complex of 1300 acres is startling. Is it or is it not being planned? Does the acceptance of one of the four alternative plans by BLM put an end to such a destructive use of public lands of high natural resource value?

I am bothered by the abstruseness of the plan. It seems both premature and unnecessarily vague.

38-1 This is the first year that funding has become available to contract for a plant study in Red Hills. See "Dear Reviewer" letter.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Heckard".

L. R. Heckard
Research Botanist and Curator

38-2 See Response 17-2(b).

COMMENT LETTER #39.

RED HILLS MANAGEMENT PLAN by APRIL 20!
Mr. D. K. Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

- Alternative 1 - Proposed Action
- 2 - Maximum Use
- 3 - Minimum Use
- 4 - No Action

April 12, 1984

DEAR SIR:

I write to urge you to adopt a management plan for the Red Hills which provides even more protection than the Alternative 3 you've devised. As an Environmental Geographer and Sierra resident for a decade, I have been visiting both the north and south sections of your parcels there for eight seasons now. The situation there has grown to be atrocious.

The helter-skelter shooting of pistols and rifles at sporadic distances often in the same directions as O.R.V. riders and nature enthusiasts is disgusting if not frightening. It is a disaster waiting to happen. You need a plan, even if you are not budgetted to enforce it, just so citizens have some reference point to report for prosecution those potentially dangerous individuals who regularly infest the northern sections.

Obviously you should aim for the enforcement of Plan # 3.

I have spent many hours in group studies and solitary reflection of this unique botanical zone. I see no reason why such a unique area of California's natural heritage should be sacrificed, especially when Del Porto Canyon provides an alternative location for activities such as your alternatives 1, 2 and 4 would sanction.

2

39-1 Just last weekend I was accompanying a group of 90 persons who gathered to study the area at a prime time for wildflowers. A fellow in army fatigues told one of our party that he was mapping a route for some "military maneuvers" (war games?) next week, involving several hundred servicemen. I don't see that type of use as generally compatible with the sensitivity of the area. There were 30-50 others in a local Columbia College class exploring the Six Bit Creek in North Parcel. I've enclosed yesterday's article about the former group.

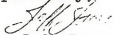
39-2 Alternative 3 could be expanded (into 5) to include a minimum 100 yard corridor on both sides of Red Hills road even in the northern "intensive use" area. Supervisor Bill Davidson's proposal for the major shooters' 1000 yard competitive range would supposedly cater to more sedate, safety-minded marksmen. Yet 39-3 I think that it is completely out of place, especially being so near to the creekbed which runs through the southern area of protection for 4500 acres. I have explored that area and its rare plants, even seen a very decayed coyote carcass at creekside.

As a Geographer, this long range I must judge inappropriate for the Red Hills.

In closing, let me say that Tuolumne Co. residents do go out there in the winter, if only to watch Bald and Golden Eagles and Hawks, and to experience a very tranquil area warmer than the more snow-susceptible elevations east of Sonora. I go there year round, and stop there also when passing through to Merced.

It is a strange area, with an unusual allure. Please preserve it by enforce Alternative # 3.

Respectfully,


Jeff Jones

1000 17217 E. Columbia Way (#D)
Sonora, CA 95370

39-1 See Response 5-2.

39-2 See Response 12-4. a

39-3 See Response 17-2(b).

18 April 1984

To: D.K. Swikard, Area Manager

BLM

63 Natoma St

Folsom, CA. 95630

From:

Jillian Devorak

730 Regatta Dr.

Sacramento Ca 95833

I appreciate this opportunity to comment on the Red Hills Management Plan planned by BLM. The management of this area has been a long time in coming but will nevertheless be welcome.

I basically agree with Alternative 1 but feel I must make additional comments and recommendations to modify it slightly or to point out some errors and omissions as I see them.

- 40-1. I agree that a distribution and density study on the sensitive plants is needed, before the revision of the Plan would be better. When this is done it can be used as a guideline for implementation of the Plan i.e. ORV trails and roads can then be built or existing ones used in a manner that best protects the sensitive plants.
2. I think the Bureau's idea of monitoring the plants and any adverse impact is a good idea.

2. cont. However, I think that at least for the first five years (maybe longer) that this should be done from the ground annually. If we wait three years inbetween photographs, ⁴⁰⁻² it may be too late to save some areas. I believe that an initial combination of "on the ground" and aerial photography would be more than adequate to protect flora, fauna, and soils from adverse impact. At least, they would be aided

3. It is obvious by the need to impliment a management plan that people have abused the area in the past. It is also obvious that people who are abusing the area are not law-abiding recreationists. The abusers enjoy a freedom, in the Red Hills, to destroy at will and without restriction or regard for other users of the area. My concerns are not with those few groups that are organized groups or clubs. These groups are the people that should be provided for with designated areas of public land.

Perhaps the ORV abusers would be happy with a challenging "free-play" area. This area would be controlled, but would allow them to ⁴⁰⁻³ "let off steam" in an IUZ area of low intensity of sensitive plants. Once again, this is

3. cont. a good reason to do a thorough distribution and density study before revision.

Included with the abusers are the plinkers. I am in full agreement with you of the need to adopt a county ordinance to eliminate indiscriminate shooting. It is an obvious problem that is evident by the damage already done. However, I do believe that in all fairness to law abiding hunters of this area⁴⁰⁻⁴ that the county ordinance should not include them. The plinkers will have to be controlled by the Tuolumne County Sheriff Department enforcing the county ordinance and by obvious well-placed signs.

4. As is evident by my previous statement, I agree with the need to reach an agreement with Tuolumne County Sheriff Department to patrol the area. I urge you to show some evidence of an agreement in the revision. There is no guarantee that the Tuolumne County Sheriff Department can oblige and so much of the Plan is contingent upon their agreement. I also recommend that they be requested to patrol very frequently especially for the first few years until the area becomes known a controlled area.

40-5 | Initiating controls by signs should be started now.

4. cont. This will get people used to the idea that the area will be controlled and hopefully there will be some early compliance.

5. I agree with the Plan to provide a viewing zone of wildflowers along Red Hills Road. I think it should be at least 100 yards on both sides of the road. I do not yet understand why you show it on the map as narrowing down in some ⁴⁰⁻⁶ places. Perhaps you could shed some light on this for me. Could the viewing zone be extended the entire length of Red Hills Road covered by BLM management? If so, I would like to see it happen, of course, this would exclude road and trail access areas and shooting areas.

6. I am in favor of providing shooting areas for enthusiasts, however, I would have to strongly oppose the shooting area in Section 27 under Alt. 2 should you be encouraged to put one in there. The impact would be detrimental to people, vegetation, and wildlife in an area you would have designated an ACEC. The noise alone would be disturbing to people inspecting wildflowers and wildlife. It is too close to potential bald eagle nesting habitat. The area required for this particular shooting area is too extensive and

6. cont. negative impact would ultimately effect three times the amount of area. Perhaps another shooting area could be provided in the IUZ in an area of low intensity of sensitive plants or unusual plants. I suggest the RVZ remain untouched.

7. 40-7/What is BLM's manner of "fully protecting soils? Are you going to completely fence them off? The areas reserved for protection are very small anyway, and I would like to see these increased if possible or at least protected by a buffer zone.

8. As I read the Management Plan I was aware of several errors and omissions. The following are some of the major ones.

a) There is a discrepancy between information on page 28 and page 42. It concerns the adverse impact on ⁴⁰⁻⁸lomatium and soaproot in Alt. 1. If the information on page 28 is correct then the information on page 42 should read that 15% of the lomatium and soaproot will be adversely impacted.

b) BLM has omitted herps, amphibians and reptiles from the common species list. I find this ⁴⁰⁻⁹incredible considering this area. Herps are an integral part of the communities in this area, both terrestrial and aquatic, and they cannot be ignored.

8, cont. c) Along similar lines to b), BLM has omitted insects from the common species list. Once again, insects are a very important part of this exceptional area. Do not ignore them. BLM needs to include a list of aquatic and terrestrial species of insects.

d) Please review the whole common species list and bring it up to date. It is seriously depauperate and doubtful (eg. fish list). The result is very misleading and makes the area look like it is generally low in all life.

e) ⁴⁰⁻⁹Reproduction information for Lomatium congonii ⁴⁰⁻¹⁰has been omitted on page 52.

40-1 See "Dear Reviewer" letter.

40-2 See Response 12-5.

40-3 See Response 17-8.

40-4 See "Dear Reviewer" letter.

40-5 See "Dear Reviewer" letter.

40-6 See Response 12-4.

40-7 No discretionary surface disturbance will be authorized for the areas specifically identified for soil protection.

40-8 See Revisions and Errata.

40-9 See Response 17-4.

40-10 This information is not available.

COMMENT LETTER #41

5739 Colton Blvd.
Oakland, CA 94611
April 18, 1984

Mr. Dean Swickard, Area Manager
Bureau of Land Management
Folsom Resource Area
63 Natoma St.
Folsom, Ca 95630

Dear Mr. Swickard:

Your draft management plan for the Red Hills was extremely disappointing in its lack of protection for rare plants.

- 41-1 While it seems possible that the firing range within the ACEC will help preserve rare plants found there, there are no contingency plans for what will happen if the rare plant populations in fact do not maintain their current levels. Furthermore, 41-2 many of the rare plant populations are not within protected areas--in fact, many are in Intensive Use areas-- and it seems extremely unlikely that the rare plant 41-3 populations can be effectively protected there. The plan is not clear on just how this protection will be effected.

May I remind you of the problems experienced in the San Benito Mountain/ Clear Creek Recreation Area-- in an attempt to permit ORV use in an area which clearly had outstanding ecological values, the ecological values were allowed to deteriorate to a point where emergency US Fish and Wildlife Service listings were imminent. BIM responded by placing some hastily-built fences around the rare plant populations, with the result that the rare plants are just barely hanging in in some closely restricted habitat, which is always in danger because of random ORV forays into the fenced areas, and the plants certainly have no opportunity to increase their range into the adjacent devastated areas.

It's a bad idea to try to overlap conflicting uses, and the Folsom Resource Area will pay the price of having constant skirmishes between conservation and resource management on one side and ORV use on the other. BIM will be right in the middle, taking a lot of well-deserved heat, for the foreseeable future.

I urge you to reconsider this Red Hills Plan. Place a good proportion of the rare plant areas under protection--real protection, such as an ACEC whose main purpose is the protection of the rare ecological features-- and put the ORVs and rifle range some reasonable distance away. This is the only rational solution that will prevent constant squabbling over this issue.

Sincerely,

Barbara Malloch Leitner
Barbara Malloch Leitner

41-1 See Response 17-2(b).

41-2 See Response 3-1.

41-3 See Response 38-11.

DEPARTMENT OF FISH AND GAME

1416 NINTH STREET
SACRAMENTO, CALIFORNIA 95814
(916) 445-3531

COMMENT LETTER #42

April 18, 1984

Dean K. Swickard, Area Manager
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

Dear Mr. Swickard:

The following are supplemental comments and recommendations concerning the Draft Red Hills Management Plan and Environmental Assessment SCH #84022007. As stated in our letter of 16 March 1984, the Department supports the proposed action (Alternative 1). This letter is to convey further suggestions and concerns relating to the planned actions (page 4-5) in the Management Plan that protect sensitive plant species and vegetation in the Red Hills.

- 42-1 | 1) Planned Action #1 designates 4,500 acres as a Restricted Use Zone (RUZ). We strongly support designation of this area as an ACEC, with emphasis on protection of sensitive species. No action that is counter to the intent of ACEC designation should be permitted. It is our opinion that surface disturbance should be limited to a maximum of 1% of the ACEC to safeguard sensitive species and natural area values.
- 42-2 | 2) What is the definition of surface disturbance? Does it include ORV activity? Small disturbances of scattered sites covering a total of 45 acres (1%) could quickly degrade the wildlife and plant values of the area.
- 42-3 | 3) We strongly agree with completing and analyzing the study on sensitive plant species prior to formulating the final management plan. We are
42-4 | concerned that the plan does not address how BLM will "allow no surface disturbance in the management area until the study is completed" (as stated in Planned Action #5). Detailed proposals for this action should be included in the plan.
- 42-5 | 4) The Department suggests that the 100-yard wide viewshed on both sides of Red Hills Road be extended the entire length of the road, with the exception of the shooting zones and vehicle access areas.
- 42-6 | 5) The Department suggests that, prior to disposal of the 40 acre tract mentioned in Planned Action #6, a complete botanical inventory be conducted to determine if sensitive species occur there. Disposal of the

area should be contingent only upon a negative finding of sensitive species.

- 42-7 6) Adequate enforcement of use restrictions on off road vehicles and indiscriminate shooting does not appear to be ensured by this plan. Frequent patrols, particularly during the first year, will be necessary to provide protection to the natural resources for which the plan has been written. We ask that an agreement to provide sufficient patrolling (weekly, and weekends especially) be arranged with the county prior to finalization of the plan.
- 42-8 7) In addition to the aerial photography monitoring offered in Planned Action #8, we propose annual on-the-ground monitoring of sensitive areas and the condition of signs. This must be done to ensure that ORV use does not shift into sensitive plant or vegetation areas and go unnoticed until damage is extreme.
- 42-9 8) We suggest that the Environmental Assessment be enhanced with more complete species lists that better reflect the known biological information on the Red Hills.
- 42-10 9) There appears to be a discrepancy between the percentages listed for impact to soaproot and lomatium on pages 28 and 42 of the Environmental Assessment. Should the total in Alternative 1 on page 42 be 15% instead of 5%?

Thank you for the opportunity to comment on the plan. We look forward to your reply and the final plan. If you have any questions please contact Susan Cochrane, Endangered Plant Program Coordinator, at (916) 324-3814.

Sincerely,

42-1 See Response 17-2(a).

42-2 See Revisions and Errata.

42-3 See "Dear Reviewer" letter.

42-4 See Response 17-3.

42-5 See Response 12-4.

42-6 See Response 2-1.

42-7 See Response 6-2 and 17-7. Since some shooting may be associated with hunters, can the Dept. of Fish and Game supply a schedule of patrol by game wardens to help protect the natural resources including wildlife during the important first year?

42-8 See Response 17-5

42-9 See Response 17-4

42-10 See Revisions and Errata

Jack C. Parnell

Jack C. Parnell
Director

SAN
JOAQUIN
DELTA
COLLEGE



COMMENT LETTER #43

MAY 18, 1984

Mr. D. K. Swickard
Folsom Resource Area
63 Natoma St.
Folsom, Calif. 95360

Dear Sir;

My botany students and I have visited the Red Hills area many times on field trips. We are glad that there is now a plan to protect this unique natural resource for multiple uses.

I hope that target practice can be restricted to a safe, well marked area and that off-road vehicles can be restricted to areas where there are no rare plants, rare animals and unique soils.

For these reasons I hope that Alternative I of the Red Hills Management Plan will be the one chosen.

Thank you,

S. K. Gooding

BIOLOGY/BOTANY INSTRUCTOR
SAN JOAQUIN DELTA COLLEGE

April 18, 1984

D.K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA. 95630

Dear Mr. Swickard

Thank you for reading my concerns on the Red Hills Management Plan. I appreciate your interest in seeing that the Red Hills area achieve appropriate management and protection.

I have visited the Red Hills area for several years as a wildflower enthusiast, botany student and hobbyist. Most of the area is covered with litter, shooters continue target practice on mature trees (and across Red Hills Road) riddling them until they topple over; off-road vehicles create serious erosion in winter and dust in the summer. My latest visit to Red Hills, April 7, made me realize that this past winter's clean-up was futile; more trash covers the ground.

44-1 | Off-road vehicles continue their noisy, destructive activities on hills that
44-2 | cannot tolerate traffic. Serpentine rock, the constituent of Red Hills' soil,
contains high amounts of mercury, chromium, nickel and asbestos. I feel that
ORV activity on this type of soil presents a direct health threat to those who
breathe the dust (the impact of ORV activity on air quality is not addressed
in the Environmental Assessment draft). Also, ORV activity endangers rare plants
and renders the soil good for nothing but erosion.

I have never visited the Red Hills area alone for fear of my personal safety. Witnessing intoxicated groups with rifles, committing irresponsible acts makes me hope for and motivates me to write for a strong management plan with clearly limited intensive use and frequent legal patrols to enforce changes. I recommend Alternative 3 of the Red Hills Management Plan and Environmental Assessment draft.

The following areas require additional emphasis:

- A) I would also like to recommend that rifle ranges be clustered within Intensive Use Zones. An appropriate area would be in SE1 of Section T1S r14E. Shooting from flat areas into the hill that borders Sections 8 and 17. Easy access is from Red Hills Road at either Section 17 or 18. Shooting be done in marked areas only.
- 44-3 | B) "No Dumping" signs should be erected at all entrances to prevent more trashing of the area.
- 44-4 | C) I would like to see all sensitive areas fenced for plant protection of the following (and more) rare plant species: Lewisia rediviva, Allium sanbornii var. tuolumnense, Streptanthus polygaloides, Minuartia douglasii.

additional emphasis (cont.)

- 44-5 D) Since this area is public land, my land, I think a plan should begin immediately to arrange or contract for law enforcement in the Red Hills Area.
- 44-6 E) A scenic corridor of 100 yards, each side, should be extended along Red Hills Road, excluding fenced staging areas; shooting ranges and access roads.
- 44-7 F) I do not wish to see present trails connected with new trails; the ORV roads in Section 20 with those in Section 19. This would keep vehicles from going back to sensitive plant areas in NE corner of Section 19.
- 44-8 G) Monitor resource area on the ground annually for soil disturbance, vegetation disruption, sensitive plant and resource degradation.
- 44-9 H) Request free assistance from local conservation organizations and individuals for monitoring the above programs.
- I) Conduct further inventories of the fauna, soils, flora and other important ecological components of the resource area.

I feel my comments will be constructive, thank you again for the opportunity to comment on the Red Hills Management Plan.

sincerely

Ruby Fales

Ruby Fales
PO Box 3552
Modesto, CA. 95352

- 44-1 See Response 21-2.
- 44-2 The impact of air quality from ORV activity was not addressed in the EA since it is not considered a major or even minor issue in the area.
- 44-3 See "Dear Reviewer" letter.
- 44-4 See Response 17-11.
- 44-5 See Response 17-7.
- 44-6 See Response 12-4.
- 44-7 See Response 17-19.
- 44-8 See Response 12-5.
- 44-9 See Response 12-10.

Wm. Sienkowski
P.O. Box 1111
Jamestown, Ca.
95327
April 18 1984

Mr. D.K. Swickard
Area Manager
Folsom Resource Area BLM

Dear Sir;

45-1 | Thank you for the opportunity to comment on your Red Hills Management Plan. I am in complete agreement with the aims as stated. There is an omission, and in my opinion, a major one, that of lead pollution of water for human consumption and agriculture.

The nature of lead poisoning is that it is cumulative and that in the early stages the symptoms are obscure. But I don't want to discuss medicine I want to warn about the volume of lead accumulating in the watershed along Red Hills Rd. People adding to it, if they think of it at all, see their contribution as no big deal. The public agencies getting the water must be depending on dilution to hide the problem as they do with pesticide, herbicide and sewage pollution. Sweep it under the rug until the pile trips you up.

Under "Objectives" #12 proposes a positive response from the supervisors in the form of an ordinance. This is wishful thinking. A prior commitment in the form of an air tight ordinance with real enforcement should be the number one step before any other move is made. The county has encouraged these people to come here as organized groups, promising them facilities and cooperation. The first move is up to Tuolumne County. It will probably take a little heat to get them moving. While the shooting is done from as close to the right of way as possible the lead is deposited on BLM land. This is where the BLM has the leverage. And the BLM has the means to apply it. It would transform public apathy to public support without the taint of BIG BROTHER.

45-2 | The Modesto Bee in a news article Mar. 12 hinted that there was a deal being cut whereby something called the Red Hills Sportsmens Assn. would be in line to sub let from Tuolumne Co. a 1200 acre country club which would be leased to the county as the solution to the Red Hill problems. Maybe this is a trial balloon in a trading process. It deserves to be shot down with a paper bullet. The BLM has a duty to protect the public as well as the public land. It would also remove the BLM one step from control but not from responsibility or culpability. There is no way to recover the heavy metal that is already dispersed and that will be leaching into valley water long after New Doh Pedro reservoir is silted up. In this case prevention is also the cure.

I can see where a facility such as a rifle range could be constructed so as to capture all firearms missiles for later recovery. this facility would have to be accessible to all shooters to make it work. It's use would have to be mandatory for all shooting in * in this area with lead missiles except hunting, in season. A subsidy might be required to get it started to make it a pay as you shoot operation. Pay as you shoot could be taught here and like toilet training, be a step toward civilization. The merchants should like it. The supervisor(s) would have to refocus eyeballs on something farther out, or maybe closer.

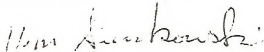
Maybe the need for or demand for rifle ranges has been overstated and is only a product of current pressures of insecurity. It needs to be tested. In the meantime the lead is accumulating. Giving homes to armed gangs who meet occasionally does not solve the problem of the transient shooter who may also be a member of a club. Closing the Red Hills Road is not the answer. The National Guard uses blank ammunition on their exercises. There is a thought here but I will skip it. But maybe they could use a rifle etc. range here.

I was glad I saw no proposals for Section 16 but maybe that is an illusion. They had moved in, made a lot of improvements after posting nearly every tree with a no trespassing sign and proceeded to do their thing under a lot of confederate flags. I did not see a single U.S. flag displayed.

My suggestion for confining the shooting to Target ranges for every one is sincere. I'm very serious about the lead problem. The spent lead is beyond recall, But tuolumne county was instrumental in bringing things to this point of need for immediate action and must spend some money on more than replacing road signs in sets weekly.

Thank you for the opportunity

Sincerely



- 45-1 We do agree that there is much spent lead along Red Hills Road and especially at the designated shooting area. However, lead in this form is mostly inert and its sorption by soil or leading into the watershed is inhibited by the neutral soil PH (see Zinadahl, R. L. and J. J. Hasset. 1977. Lead in Soil., in Lead in the Environment. W. B. Boggess (ed.) p. 93-98).

- 45-2 On page 26, the EA refers to the interest developing a rifle range. Until such time that we receive a formal application for such a development, and go through the environmental assessment process, it is impossible to evaluate its impacts on sensitive plants and unique soils.

COMMENT LETTER #46

Bill Richmond
304 W. Yaney
Sonora, Ca 95370

April 18, 1984

D. K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma St.
Folsom, Ca 95630

Dear Mr. Swickard:

In the matter of the Red Hills Management Plan and Environmental Assessment I support Alternative 1, the proposed action. If I thought it would work, I'd support Alternative 3, but I do not think that it would be enforceable.

46-1 | The only change that might enhance this plan would be a suggestion that was made when this plan was presented to the Tuolumne County Board of Supervisors. That was to make the "plinking" area an integral part of the proposed rifle range where it could be operated under regular supervision.

46-2 | To me a critical issue is the matter of working out a cooperative agreement with the Tuolumne County Sheriff's Department to patrol the Management Area; no higher level management plan is going to work without this element. Too, there must be clear-cut regulations for the Sheriff to enforce.

Another action that would make this a more manageable area, in my opinion, would be repaving Red Hills Road so that it would become an arterial. Increased traffic thereby generated should help change the feeling of remoteness and that nobody cares. It should thereby cut down on the amount of illegal usages.

Thank you for your consideration.

Sincerely,

Bill Richmond
Bill Richmond

46-1 See Response 17-2(b).

46-2 See Response 6-2 and 17-7.

Modesto Ca
April 18, 1984

D. K. Hirschland
Bureau of Land Management
Tolowuk Renovation Area
63 Natoma St.
Tolowuk, Ca 95630

Plan 3 is only a minimum attempt to protect rare plants in the Red Hills area. We do not favor special privileges to 2 sportsmens groups.

We feel that The BLM is missing an opportunity to set up a "Model Environmental Preserve" in a fragile unprotected area.

Mrs. Mrs. H. W. Fleisher
2406 Corrington Ct.
Modesto Ca 95350

4/18/84

D.K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

re: Red Hills Management Plan and draft Environmental Assessment

The challenge of introducing a management plan to an area where activities have historically been conducted at whim must be great and the issues made more complicated as more citizens offer their advice. In that light, I appreciate your consideration of my comments.

Of the four alternatives suggested, I support Alternative 3-Minimum Use, for the Red Hills Area. I believe that much of the demand for ORV and shooting activities within the management area is due to the absence of regulation and enforcement in the past, rather than being based on any natural or intrinsic assets which the area provides ORV/shooting activities.

As indicated in Table 2, page 39, Alternative 1 achieves all 9 objectives. However, Alternative 3 exceeds four of the nine objectives. Three of these objectives, sensitive plant species, digger pine habitat and unique soils are the most imperiled by shooting and ORV use. While advocacy for plants and soil protection will not threaten the existence of ORVers and shooters, but merely affect their distribution, the converse is false; unfortunately sensitive plants and soils cannot change locales when frequently disturbed, they merely cease existence. ORVers and shooters will reduce the populations of plants and threaten soil integrity. I believe that other locations outside of the Management Area offer ORVers and shooters choices unavailable to plants and native soils. Thus, I feel that the comparison made in table 2, page 39 indicates the superiority of Alternative 3.

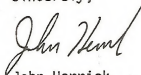
48-1 | "Annual ocular reconnaissance" prescribed in Alternative 3 contributes to that alternative's superiority. A more frequent and intense survey will provide a better measure of the Management Plan's effectiveness and afford greater responsiveness. In addition, the more frequent appearance of BLM personnel would discourage vandalism and other indiscriminant activity.

48-2 | I acknowledge that preservation-oriented Alternative 3 may require more stringent enforcement and more frequent monitoring but I believe that these are short-term concerns. As it becomes obvious that the Red Hills area is no longer at the junction of Highway "nobody tells me what to do" and Road "who's gonna stop me", these people and their activities will go elsewhere. Cooperation with enthusiast groups and professionals can be developed to share the responsibility of monitoring plant and wildlife populations as the Red Hills becomes a safe place to explore.

COMMENT LETTER #48 continued

Destructive recreation benefits no one in the long term and makes mockery of the multiple use concept. Please register my support for Alternative 3-Minimum Use for the Red Hills Management Areas and accept my gratitude for the evening meetings and weekend activities you and your staff have presented on this issue.

sincerely,

A handwritten signature in cursive script, appearing to read "John Herrick".

John Herrick
306 Davis Street
Modesto, CA 95354

48-1 See Response 6-2 and 12-5.

48-2 See Response 12-10.

Central Sierra Audubon Society

Post Office Box 1754
Columbia, California 95310

COMMENT LETTER #49

April 19, 1984

D. K. Swickard

Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

Dear Sir:

Central Sierra Audubon (CSAS) supports the proposed Action, Alternative 1, as an acceptable plan for the Red Hills with the following exceptions.

- 49-1 | 1. We believe that disposal of the 40 acre tract with deed restrictions would not adversely affect the future of the Red Hills flora & fauna. The funds derived from the sale would help offset some of the costs associated with monitoring the areas flora & fauna.
- 49-2 | 2. BLM must guarantee a cooperative law enforcement plan since Yuba County does not have the resources to provide this essential portion of the plan.

Central Sierra Audubon Society

Post Office Box 1754

Columbia, California 95310

COMMENT LETTER #49 continued

- 49-3 3. On-site monitoring of sensitive flora & fauna must be done on a regular yearly basis throughout the year in addition to the aerial surveys. Damage can occur quickly and go unnoticed otherwise. On-site inspection during special "hi-intensity use events" is recommended.
4. Closing the Six Bit / Poor Man's Gulch gate and prohibiting fuel wood gathering is necessary to help reduce impact on the eagle habitat.
- 49-4 5. CSAS would prefer to have the entire Red Hill Rd "canyon" protected as a view zone as described in alternative 3 to provide a quality viewing experience. The road border is the very least we would consider.
- 49-5 6. CSAS supports prescribed burning to return chaparral to its natural healthy state and to prevent disastrous wildfires. We suggest test sites and research, at first, to determine whether or not the sensitive species will be adversely affected. It is our belief that they are more than likely adapted to the chaparral and the associated fires.

Central Sierra Audubon Society

Post Office Box 1754
Columbia, California 95310

page 3

COMMENT LETTER #49 continued

- Prescribed burning at the appropriate time may be very beneficial.

We wish to commend you for attempting to create a plan which balances the many uses of the Red Hills and we thank you for an opportunity to comment.

Yours truly,

Jonis L. Hurt
President

- 49-1 See Response 2-1.
- 49-2 See Response 6-2 and 17-7.
- 49-3 See Response 12-5.
- 49-4 See Response 12-4.
- 49-5 See Response 11-10.

COMMENT LETTER #50

Mr. D. K. Swickard, Area Manager
Bureau of Land Management

Mr. Swickard,

With regards to the Red Hills Management Plan. I would like to voice my support for alternative 3, the Minimum Use plan. Actually, I wish there was a fifth alternative that would not include any off road vehicle activity in the Red Hills and limit any firing range to a small area in the northern portion. I feel that off road vehicle enthusiasts have plenty of places in the area to use without them spoiling the Red Hills. Also they can use the many miles of roads that were made for vehicles.

Thank You

James T. Fauss
115 Magnolia Ave.
Modesto, CA. 95354

Strongly urge
management
that will protect the
integrity of the unique
ecosystem of the
Red Hills area.

Land use should
not allow indiscriminate
use by favored groups.

M. W. Flecker
2400 Dominguez Ct
Modesto, CA 95350



L. K. Swickard
B.L.H.
Folsom Resource Mgmt.
63 Natoma St
Folsom, Ca.

95630

Bureau of Land Management
Talsom Resource Area
63 Natoma St.
Talsom, Ca. 95830

Dear Mr. Swickard,

After reviewing the Red Hills Management Plan, our recommendation is for Alternative 2 - maximum use.

We would like to receive the Final Red Hills Management Plan.

Thank you,
The Modesto Ridge Runners
c/o Steve Rush
1931 Jolly Rd.
Napa, Ca. 94532

COMMENT LETTER #53

1570 Linwood Dr.
Modesto CA 95350



D. K. Swickard, area manager
Bureau of Land Management
63 Natoma Street
Folsom, Calif 95630

© USPS 1981

April 14, 1984

I have enjoyed the spring wildflower display along Red Hills Road in Tuolumne County again this year.

Please help protect this area and designate it as a scenic route. It is a great place to study unusual soil, geology, plants, animals and historical aspects.

53-1 See Response 12-4.

On state dodging bullets, stepping on broken glass, the roaring noise of gunshots and off road vehicles as they tear up this fragile terrain.

Destruction and noise are not compatible with your job as caretakers of our public lands. Please protect those helpless and fragile plants for our future generations to see and enjoy. This is one of the rare places easily accessible to the elderly, handicapped, and students. Please save.

Eloise Cherry

09AR84

Dear Mr. Swickard:

I have reviewed the Draft Red Hills Management Plan and Environmental Assessment. I want to thank you for this opportunity to comment.

As I have lived in Stanislaus and Tuolumne Counties most of my life, I have been through the Red Hills dozens of times. As with most people, the majority of those instances have been drives on Red Hills Road.

I have been dismayed for many years as the increased unregulated use by ORV and shooting recreationists has been allowed unabated, resulting in a trashy ravaged scene most evident from Red Hills Road. That the BLM would allow such abuses to mount on public resource lands for so long is rather disconcerting to me. This lack of management and "free-for-all" atmosphere have contributed to the present nefarious condition of hillsides littered with glass and trash, scarred with eroding ORV routes. The meadow that was formerly present on the south side of Red Hills Road in the NE corner of Section 19 is now devoid of vegetation because of the BLM's inattention. Why have these destructive activities been allowed all this time?

I am somewhat encouraged that your agency is now attempting to develop a plan to manage resources and activities in the Red Hills area, but I find the Draft Management

Plan and Environmental Assessment woefully inadequate, including the proposed action - Alternative 1.

I ask that you consider the following, which are my sincere recommendations for management of the Red Hills:

1. The southern and eastern portion, south of Red Hills Road, be closed to ORV's with no designated open roads except for those leading from the Sixbit - Poorhills Gulch access road as shown under Alternative 3. This entire area should be designated an ACEC with the provision that no further development, such as a rifle range be allowed in the area.
2. All vehicle routes which pass through known areas of the 5 plant species addressed in the draft should be closed immediately until impacts are determined which may allow selective reopening or re-routing. It is apparent from Maps A that many "proposed open roads" pass through many of the sites of these plants. This fact was not adequately addressed in the draft and must be.
3. Although not a part of the draft, a rifle range proposed in the area should be assessed for location in the northern region where it seems some areas of suitable topography exist. This may be necessary, large scale activities from the Red Hills Area.

4. Vehicle use in stream & riparian areas must be minimized. These are the most important biological environments for a majority of animal species in the Red Hills. I was not impressed at the very cursory information provided by an "Environmental Assessment" on the plants and animals of the Red Hills. It indicated to me that BLM has little good information on the area. "Common" species lists are of no value in depicting population levels, distribution, presence, and seasonal utilization of Red Hills by animals. I don't see how BLM can confidently develop a Management Plan on the basis of such little information. Knowing where the people are and what they do is one thing, but providing the public a demonstration of understanding the biotic situation and using that information in the proposals is what needs to be done. Why not include ~~a~~ complete species lists, especially for plants? Why were no reptiles and amphibians listed? No information? How can a management plan be even proposed without the basic data?
5. I suggest that B&W aerial photos be included in the draft which show the existing impacts of ORV use and shooting in the area.

54-3

Thank you, and I hope that these concerns can be considered in the development of a management program for the Red Hills.

Sincerely,

Tim Ford

54-1 Surface disturbance associated with open trails is part of the allowable surface disturbance for a particular alternative. Also, see Response 17-5, 28-13, 32-1.

54-2 See Response 17-2(b) and 17-16

54-3 See Response 17-4

COMMENT LETTER #55

April 18, 1984

D. K. Swickard
Bureau of Land Management
63 Natoma Street
Folsom, CA 95630

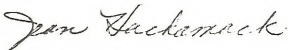
Dear Mr. Swickard,

Thank you for giving me the opportunity to review the Red Hills Management Plan.

I believe Alternative 3- Minimum Use to be the best of the alternatives presented.

I am interested in preserving the native plants and wildlife habitat. I am also interested in some law enforcement regarding shooting and littering.

Sincerely yours,



Jean Hackamack
5100 Parker Road
Modesto, CA 95355

COMMENT LETTER #56

April 10, 1984
D.K. Swickard, Area Manager
Bureau of Land Management
63 Natoma Street
Folsom, Calif. 95630

Dear Mr. Swickard;

As a user and "non abuser" of the Red Hills area of Tuolumne County, I urge you to utilize alternatives to minimize damage to this fragile and unique serpentine area. It would be perhaps an elitist thought to propose that the area be only used for "natural" activities such as hiking, birdwatching and observation of the many flowers and shrubs. Since this is public land, the majority should be served. It is however my opinion that the majority of users here; with the exception of the National Guard, are non-shooters and non-O.R.V. users. The reason for the damage to this area and the large amounts of debris in certain sections are obvious. Shooters leave shell casings, targets, and remnants of lunch. O.R.V. users seem to leave the same type of debris plus gouge the soil as they go.

There are many other local sites for O.R.V. use and shooting. The area along Red Hills Road, and there only, could incorporate a rifle range, if it were maintained properly. The area along Red Hills Road, and there only, might also have two or three hills that could be climbed by O.R. V. users. The question remains, who will maintain and protect the fragile and limited use areas. We are not dealing with brilliant minds, in most cases, and signs are often mistaken for targets and "winching posts."

The patrolling, maintenance, and protection of the area to insure that the majority is represented is my prime

56-1



THE FOLLOWING COMMENTS
WERE RECEIVED AFTER THE
COMMENT PERIOD WAS OVER



concern, my deeper thoughts are focused toward total conservation here. The B.L.M. should spend more time in this area, discuss the ecological impact with a greater variety of specialists, and create further alternatives.

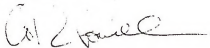
The time spent by yourself in reading Mr. Joe Medeiros' comments in his letter of April 9th will be worthwhile. He cites many problems with the current proposals, and does so much more eloquently than I. Although not a member of any "organized" group, I fully support preservation of rare and beautiful wildflowers especially certain endemic species found in the Red Hills.

We can't afford to make mistakes with the land year after year. Long after the last of the O.R.V.'s and rifles are ground into scrap the land will still be here. How it will look and what life forms it will support is our responsibility.

Thank you for your time spent in reading this letter.

Sincerely,

A.R.Powell

A handwritten signature in dark ink, appearing to read 'A.R. Powell', with a stylized flourish at the end.

COMMENT LETTER #56 continued

concern, my deeper thoughts are focused toward total conservation here. The B.L.M. should spend more time in this area, discuss the ecological impact with a greater variety of specialists, and create further alternatives.

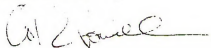
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We can't afford to make mistakes with the land year after year. Long after the last of the O.R.V.'s and rifles are ground into scrap the land will still be here. How it will look and what life forms it will support is our responsibility.

Thank you for your time spent in reading this letter.

Sincerely,

A.R.Powell



56-1 See Response 6-2.



CORVA

CALIFORNIA OFF ROAD VEHICLE
ASSOCIATION, INC.

3472 Birdsong Avenue
Thousand Oaks, CA 91360
(805) 493-1680

April 16, 1984

COMMENT LETTER #57

President

William L. Mallory Jr.
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Chuck Hollingsworth
1155 Mariano Drive
Ojai, CA 93023
(805) 646-5803

D. K. Swickard

Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

Dear Mr. Swickard;

The California Off Road Vehicle Association appreciates this opportunity to participate in the review of the Red Hills Management Plan and Environmental Assessment.

CORVA finds that Alternatives 1 and 3 are based on false suppositions that multiple use is detrimental to the Red Hills area. It is noted that the proposed "endangered" sycamore and onion populations are abundant within the current unrestricted use structure, and minimizing recreational use of the area for their protection is invalid.

It is agreed that indiscriminate shooting and unauthorized use (such as fuelwood theft and illegal dumping), should be curtailed. Since Alternative 2 provides for adequate resource protection, provides suitable use areas for off-road vehicles, and curtails shooting and unauthorized use, it is recommended for adoption.

It is strongly recommended that Alternative 2 include planning for intense public notification of planned military maneuvers, fire abatement procedures, and major fuelwood gathering operations to avoid conflict. It is further recommended that you pursue an "adopt-a-trail" volunteer maintenance program to limit surface disturbance and trail proliferation.

Please let us know if we can be of further assistance. We would appreciate receiving a copy of the Management Plan upon its completion.

For the Association,


DONNETTA CARNAGEY
Vice President

57-1 If current unrestricted use and future demands on the area are not managed under proper constraints, these sensitive plants could become endangered.

April 16, 1984

D. K. Swichard, Area Manager
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

Dear Mr. Swichard

I have read the pamphlet drawn up by the Bureau of Land Management listing three proposals for restricting use of the Federal land in the Red Hills.

After driving through the Red Hills last Sunday and seeing cans and broken bottles strewn among the wildflowers I am prompted to write to you concerning this matter.

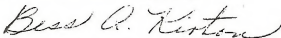
I realize that there is need for a shooting range close enough to metropolitan areas and far away enough for safety. I am decidedly in favor of a shooting range sophisticated enough to accommodate the need and to attract those who are now littering the roadside.

I also feel that there is need for open areas designated for off-road vehicle use. There would need to be enough acreage to be enticing to participants of the sport. This designated area may not keep all persons from driving through fields of wildflowers and along streams, but it should discourage most of them.

I feel that certain areas should be off limits to the public, most specifically where rare and endangered plant species are located. I am also opposed to issuing any new grazing permits.

As I know little as to what final plans should be put into action to benefit the most, I shall favor proposed action number one (1) to a degree. However, I am not completely comfortable with allowing military maneuvers nor am I sure it is wise to prohibit prescribed burning.

A concerned citizen.



Bess A. Kirton



ENVIRONMENTAL DEFENSE FUND

April 19, 1984

D. K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95630

Re: 1792, C-018.5 (Draft Red Hills
Management Plan and
Environmental Assessment).

Dear Mr. Swickard:

59-1 The Environmental Defense Fund submits these comments
in response to the above-referenced document. We have
carefully reviewed this draft Management Plan and Environmental
Assessment, and respectfully request that the Bureau defer
completion of this plan until the results of a comprehensive
analysis which documents the distribution, density, and habitat
requirements of all populations of four "category I" candidate
plant species are available and incorporated as part of this
59-2 plan. Based on the results of that analysis and to comply with
the Endangered Species Act and BLM sensitive species policy,
the Bureau must then adopt an alternative that does not permit
any destruction of these species and their populations and
habitat.

This request is based in large part on the formal
determination by the U.S. Fish and Wildlife Service that a
proposal to list the the Rawhide Hill Onion, Congdon's
Lomatium, Red Hills Soaproot, and California Verbena as
endangered species under the Endangered Species Act is
warranted by information already available to the Service (see
48 Fed. Reg. 53640, November 28, 1983 and 49 Fed. Reg. 2485,
January 20, 1984). That determination, which was made on
November 28, 1983, was required by Section 2(a)(2) of the
Endangered Species Act Amendments of 1982, codified as Section
4(b)(3)(B) of the Act. Where, as here, a species has been
formally determined to warrant proposal for listing under the
Act's criteria, a federal agency is obliged to give very close
scrutiny to actions that may adversely affect that species.

Unfortunately, the draft management plan and environmental assessment do not acknowledge the Service's formal findings. As a result, the status of these species may decline significantly in the absence of or before federal listing and, at the same time, the uncertainty to interested parties and the potential for conflict will increase unless the Bureau now fully implements its sensitive species policy.

The Endangered Species Act (ESA) requires all federal agencies to utilize their authorities in furtherance of the purposes of the Act. In recognition of that mandate, the state Director issued a final sensitive species policy statement on April 26, 1982 which declared that it is Bureau policy "to ensure that the crucial habitats of sensitive species are managed to minimize the need for listing those species" by either the U.S. Fish and Wildlife Service under the Endangered Species Act or by the California Department of Fish and Game pursuant to California Endangered Species Protection Act. Although that policy is reflected in the draft management plan by the Bureau's indication that the sensitive plant species and their habitat will be protected so that official listing will be unnecessary, it is not adequately implemented because (1) in the absence of sufficient information the Bureau cannot ensure that individuals or habitat of these species will not be destroyed and, (2) the Bureau proposes to permit further destruction of species which have already been determined to be warranted for listing as endangered species.

(1) The Red Hills Management Plan should not be finalized until a comprehensive assessment of all candidate plant species and their habitat is completed and that information is incorporated into the management plan.

The draft management plan and environmental assessment indicate that present knowledge of the distribution and densities of four of the five sensitive plant species is incomplete. As a result, it is uncertain how the estimated percentage allowable destruction of each of these species was determined, how reliable those estimates are, and most importantly whether they can and should be used in evaluating this management plan. We must answer the latter question in the negative. Clearly, without a thorough and comprehensive understanding of the location, distribution, and ecological requirements of each of these species, the Bureau will not be able to ensure that they are not extirpated and therefore subsequently listed. That conclusion is not diminished by the Bureau's assertion that site-specific environmental assessments will be developed for each project or group of projects as the plan is implemented. Against a background of insufficient information about the overall distribution and density of

populations of each of these species, and in the midst of momentum and political pressures toward completion of such site-specific actions, it may be very difficult to judge the results of those EA's and the potential for significant and cumulative impacts. That such incremental and unmitigated impacts can occur is evidenced by the permitted destruction of certain populations of two sensitive plant species under a Recreation and Public Purposes Act lease issued to the Sonora Smoke Poles and Civil War Skirmish Association in 1981.

Perhaps in recognition of this serious planning problem, the Bureau has authorized a floristic survey for three of these sensitive species and indicated that the management plan may be modified if information from this survey reveals new populations of sensitive species. We approve of that action but, nevertheless, do not understand why the Bureau plans to complete this management plan, whose primary purpose is presumably to reconcile recreational activities with protection of these sensitive species at the earliest possible time, in the absence of the results of a survey that will be available in just a few months. That action is particularly problematic because an environmental analysis of the Red Hills area and its endemic and sensitive plant species was not completed when the Sierra Planning Area Management Framework Plan was approved on February 1983. Indeed, neither an EA nor an EIS was prepared for adoption of that Management Framework Plan. Notwithstanding the question of the legality of that action, that plan was adopted almost 10 months before the Fish and Wildlife Service's determination of the very serious status of these sensitive plant species. In light of those formal findings and the significance of this management plan insofar as it may permit the incremental destruction of each of these species, we strongly recommend that the Bureau not finalize this plan until the results of the plant survey are analyzed. Based on those results, the Bureau should adopt appropriate modifications to the management plan so that it complies with the Bureau's sensitive species policy and the Endangered Species Act. Indeed, it should be within this context that EA's which are subsequently prepared for site specific projects should be evaluated. As will be discussed below, the Bureau should not permit such site specific actions to destroy directly or indirectly any individuals or habitat of these sensitive species.

(2) The final Red Hills Management Plan should protect 100% of all populations and habitat of the 4 candidate plant species.

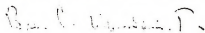
We believe that if the Bureau adopts our recommendation outlined above, then it will have achieved the first of three objectives of its sensitive species policy--to recognize populations of sensitive plant species that merit

special attention. In order to implement the two remaining objectives--to minimize the decline of sensitive species through mitigation of resource management impacts and to promote the enhancement of such species through positive management--the Bureau should adopt the minimum use alternative and avoid the potential destruction of all populations and habitats of these sensitive species. Clearly, in light of the Service's formal determination of the very serious status of each of these species, any further destruction or loss of populations of these species could necessitate immediate federal listing. Because the proposed alternative would permit up to 5% destruction of the Congdon's Lomatium and Red Hills Soaproot, and 3% of the Rawhide Hill Onion, adoption of that alternative would contravene a major objective of this management plan and the Bureau's statewide sensitive species policy -- to avoid the necessity for listing such species under the Endangered Species Act. To make this draft management plan internally consistent and in compliance with Bureau policy and the Endangered Species Act, the Bureau must adopt its minimum use alternative. That alternative would be consistent with the 1983 Management Framework Plan and would not necessarily preclude certain recreational activities within the Red Hills Area. Moreover, by adopting this alternative, the Bureau may not only avoid the necessity for federal listing of these species but when and if these species should be listed, the Bureau will have an appropriate scheme in place to benefit from interagency consultation with the Service. In the absence of such sound environmental planning, the uncertainty to all interested parties will remain significant. We can appreciate the difficulties that your office faces in reconciling protection of such species with other uses, and we believe that adoption of the minimum use alternative would be a major step toward reducing the potential for subsequent controversy and conflict.

If neither of the inadequacies of the draft management plan described above is redressed in the final plan, then we believe that adoption of the proposed alternative will have a significant impact on the quality of the environment and therefore require preparation of an Environmental Impact Statement, pursuant to the National Environmental Policy Act.

Thank you for your consideration of these comments.

Respectfully submitted,



Bruce S. Manheim, Jr.
Staff Scientist
Wildlife Program

BSM/kw

COMMENT LETTER #59 continued - RESPONSES

- 59-1 See "Dear Reviewer" letter.
- 59-2 See Response 28-13.
- 59-3 See Response 28-13.
- 59-4 See "Dear Reviewer" letter.
- 59-5 See Response 27-3.
- 59-6 See Response 28-13.
- 59-7 See "Dear Reviewer" letter.
- 59-8 The Bureau planning system does not require either an EA or EIS before adopting an MFP.
- 59-9 See Response 28-13 and "Dear Reviewer" letter.
- 59-10 See Response 28-13.



COMMENT LETTER #60

Formed February 18, 1850

April 18, 1984

D. K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, California 95360

Dear Mr. Swickard:

I have reviewed the Red Hills Management Plan and Environmental Assessment (Draft), and would like to make the following comments:

I am familiar with the area adjacent to the Red Hills Road, which route, of course, is almost identical with the alignment of the Sonora and Stockton Stage Road of the early Gold Rush period. I am also casually familiar with the portion of the Red Hills which lies easterly of the old Hawkins Bar Road and also some other specific sections. My knowledge of the area extends back to the early 1930's.

The area is particularly unique because it is, I believe, one of the last large parcels of easily accessible publicly owned land in our foothills. Its relative isolation from heavily inhabited areas makes it eminently suitable for a number of uses, many of which have developed there because of this reason. Unfortunately, some users would like to have the entire area dedicated and restricted to the field of their own particular interest.

The section along the Red Hills Road is visited heavily each year during the short period when the wildflowers and chaparral are in bloom, the time period varying, of course, in response to the particular rainfall and temperature patterns that occur. Probably about once each five years the floral displays can be classified as spectacular.

Other activities that I have observed in the area include hikers, photographers, student field groups, naturalists, gold panning enthusiasts and picnickers. There is also evidence of other use such as camping and outdoor parties. Most of the activity seems to occur in the late winter and spring months. During the heat of the summer season, when the surface water dries up, the use of the area drops off sharply.

The largest -- and oldest group -- to utilize the roadside areas are target shooters who seem to follow their sport on a year-round basis. Originally, perhaps 30 years or so ago, the shooting was generally limited to the south side of the Red Hills Road in one small area which apparently was an old borrow pit which was later used by the public as a disposal site for garbage and other unwanted refuse. Now, serious target shooters as well as general "plinkers"

are using both sides of the road from near the crest of the hill just east of the old Crimea House site to the former Mound Springs Hotel site near Taylor Hill. Also there is shooting in some off-road sites of easy access to motor vehicles.

The area is also occasionally used for small unit military training, and often by private motor vehicles designed for use in rough terrain.

Most of the above noted uses have come about because, as previously stated, the Red Hills area is ideally situated for them, and in my opinion all should be continued under some plan that would define the areas of use and eliminate the apparent conflicts of use that can occur. For example, regulations might be devised that would protect the floral areas and prevent interference with those enjoying them during the blooming period. By the same token certain areas could be designated for the exclusive use of target shooters and off-road vehicles.

I take exception to the implication that target shooters are the source of most of the litter. Over the past years I have noted many forms of debris ranging from empty oil cans abandoned after someone changed the oil in an automobile to beer and soft drink containers, remains of picnics and discarded furniture and other household trash.

It is true that some of the pine trees have been literally destroyed by bullets, and that there are a large number of spent rimfire cartridge cases as well as abandoned targets and discarded cartridge boxes; however, most of the shooters I have seen apparently reload their cartridges and in most instances take home their fired brass for reuse. Naturally there are always exceptions.

If any plant species is found to be rare or endangered, provision should be made for its specific protection. The same rule should apply to any wild life found there.

Certainly the military use of the Red Hills should not be severely curtailed or prohibited. Such use is part of our national defense and can be controlled by the officers in command in accordance with your rules and regulations.

The use of off road vehicles can also be regulated and limited to such areas and roads which will not be destructive to any natural resource or unduly interfere with other allowable usages.

Lastly, I believe that an adequate target shooting area should be set aside which will be sufficient to accommodate the various forms of shooting recreation indulged in not only by the people of this county but also those of neighboring counties and larger communities where facilities are not available. It seems reasonable to assume that you will find organizations who will be willing to cooperate with you in constructing any facilities needed and also in controlling and policing them.

I feel that if you recognize the legitimate demand for areas where off road vehicles and target shooters can pursue their hobbies, you will have little

trouble preventing them from utilizing other areas where their sport might interfere with or endanger those engaged in other activities. I think that this would also assist landowners in the area who are plagued with unwanted trespass and shooting, often committed by people out of sheer frustration because they have no place to pursue their form of recreation.

In other words, the Red Hills area is large enough to safely provide for all of the activities that now occur. It should not be restricted to any one group of advocates to the total exclusion of the others. It does not present a stalemate situation such as occurs when the river rafters face off against the dam builders and only one group of proponents can prevail. Instead, it is one in which every legitimate party can share the cake without gross injury to the other contenders.

Very truly yours,

Carlo M. McLenahan
County Historian
County of Tuolumne

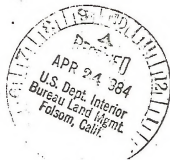
April 18, 1984



GOULD MEDICAL GROUP

Gould Medical Group, Inc.
600 Coffee Road
Modesto, CA 95355

D.K. Swickard, Area Manager
Bureau of Land Management
Folsom, CA 95630



Dear Mr. Swickard:

On April 7th I joined a group of California Native Plant Society members on a trip to the Red Hills. To our astonishment we found some 85 people waiting to join us. They were from Sierra Club, from interested conservation groups and actually from every walk of life. Many of them having heard about it through one of many sources.

The point of the trip was to check out the wild flowers which were fantastic, by the way. Also to learn about the geology of the area and about the use to which it had been put in the past and of the plan that your bureau had for this area.

We learned that there were four alternatives and possibly a fifth, that of our own, and this was discussed early during the 6 hour visit to the area. It became apparent at once that there is a great deal of use as well as misuse going on in the area. We were struck by the fact that there was a great deal of debris, cartons, old kitchen appliances, and abandoned picnic and other material. Even more striking was the fact that trees of at least 1 foot in diameter had been shot in two as used for target practice. While we were standing learning the geology, the pistols and rifles began to pop and the motorcycles began to roar. We visited first the north and then swung around through Chinese Camp and dropped down to the south and wound up at the tip of the old Don Pedro Road and hiked to Six Bit Creek.

61-1 | It is amazing how much debris has accumulated since the other California Native Plant Society members had cleaned it out as late as last winter.

We learned that even though alternative three may be your choice in the use of this area that the enforcement of the rules and regulations could be very light and only occurring on a 2-3 month basis. I would foresee the destruction of a number of rare plants which are found only in this area of anywhere in the state and these included the rawhide onion and the Red Hills silk fruit as well as California verbena and Congdon's *Lonatum*.

I am going to urge you to seriously consider alternative three with the IUZ area for the ORV people and the RUZ being satisfied for the ACEC.

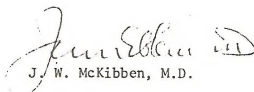
We all appreciate very much what you have been able to do, particularly in having

April 18, 1984

-2-

kept set aside all this time and we are looking forward to full use for every group and without danger or noise pollution to each other group.

Very truly yours,



J. W. McKibben, M.D.

JWM/kal
T: 4/18/84
Pages: II

61-1 Several organized groups, as well as private citizens, participated in the January cleanup. To name just a few: 4-wheel drive groups, sportsmen groups, environmental groups, the National Guard, Sonora Mining Corporation, as well as CNPS members were involved.

BOARD OF SUPERVISORS
COUNTY OF TUOLUMNE



ROBERT W. ANDRÉ
COUNTY CLERK
RUBY HAWORTH
BOARD CLERK

COMMENT LETTER #62

MILDRED FILIBERTI, First District

GREG HURT, Second District

JERRY G. BELLAH, Third District

CLYDE W. MAY, Fourth District

WILLIAM C. DAVIDSON, Fifth District

April 19, 1984

D.K. Swickard
Bureau of Land Management
Folsom Resource Area
63 Natoma Street
Folsom, CA 95630

Re: Comments on the Red Hills Management Plan and Environmental
Assessment

Dear Mr. Swickard,

General -

62-1 Prior to a detailed discussion of the specific issues, a general discussion on the plan and assessment is in order. There appear to be many problem areas in this document. For example, Air and Water Quality, Wetland/Riparian Areas and Flood Plains must be addressed as subject areas whether or not impacts are expected to occur. There appear to be some discrepancies in the soils section.

62-2 Water quality impacts from sediment and possibly asbestos fibers are not addressed in the document even though the soils in this area are known to contain high levels of asbestos. Impacts on surface and
62-3 subsurface water, wildlife and plant life from magnesium, iron, oil and grease from ORV use are not even addressed. It is difficult to imagine
62-4 that intense ORV use will not result in soil disturbance which will at the least increase sediment loads in the small streams.

The description of the riparian wildlife habitat is minimal. Close observation of the Red Hills area will indicate well defined riparian areas along the small streams in the area. An example is Six Bit Gulch. This area would meet the definition of a riparian area as described in The Federal Register, Vol 45 #25 p 7895 Feb. 5, 1980.

62-5 Under the proposed alternatives section the report mentions protection of riparian areas but the method(s) are not discussed. It is therefore impossible for the reader to evaluate the potential for success of a mitigation measure(s) which is not even described.

62-6 Page 3 There is no stated objective for providing a suitable area for shooting, even though this is a long standing use of the Red Hills area. In addition, there are no stated objectives for standards in fisheries protection, water quality objectives or riparian habitat preservation/management standards. Too

COMMENT LETTER #62 continued

- 62-7 much emphasis is placed on accommodating "the current demand for ORV events" without assessing the impacts of these events nor their relationship to other users. Item 4 on page 3 would seem to indicate that vandalism, resource damage and littering are all specific results of
- 62-8 of shooting but not, evidently known to ORV use. This is not substantiated anywhere in the report.
- 62-9 Page 4 A planned action is the protection of riparian areas from discretionary surface disturbance. The riparian areas should be identified (mapped) and referenced.
- 62-10 Page 4 Planned Action #6 is the disposition of a 40 acre tract located in T. 1S, R. 13E, Sec. 1 SW1/4. The deed restrictions do not discuss the potential growth inducement (for development) this may have on adjoining lands and secondary impacts on resources.
- 62-11 Page 5 Item 11 lists conditions for military use in the Intensive Use Zone, however no mention is made of fire protection measures. During fire season the military users should be required to provide fire fighting equipment and water to prevent wildfires.
- 62-12 Page 6 Item 12 recommends the adoption of a County ordinance to eliminate indiscriminate shooting in the Red Hills. No such County ordinance is proposed for the regulation of other uses which may damage resources to even a more severe level; such as unauthorized ORV use. The question of County responsibility for enforcement of Bureau policy is also one which bears further amplification.
- 62-13 Page 6 Item 18 is a vague and unclear statement. Needless to say a better understanding of what is proposed, other than to "cooperate" is in order.
- 62-14 Page 7 Item 22 appears to only relate to an agreement to handle one of the problems in the Red Hills as far as resource damage is concerned. It would also be appropriate to include other items in such an agreement (such as trespass, unauthorized ORV use, etc.) unless only certain types of "violations" are to be actively enforced regardless of actual relative resource damage.
- 62-15 Page 8 Item 2 is an incomplete monitoring program. More steps should be actively undertaken by the Bureau to assure compliance with management objectives by users. For example; after organized ORV uses selective inspections of the area could be made to document compliance, or lack of same, with existing management standards and goals. This same method could be used for military maneuvers or any other group use of the area.

62-16 | Page 11 Paragraph four indicates that "no disturbance will be allowed in riparian habitat or in 110 acres designated for soil protection." We are left without a clue as to how this will be achieved. What enforcement measures will be utilized to accomplish this measure.

62-17 | Page 13 Item 4 "Eliminate vandalism, resource damage and littering caused by indiscriminate shooting." Appears to lay the cause of all these activities at the door of one class of user. Is documentation available to show that other users do not cause similar problems and that therefore the problems are indigenous to most users and not a single group?

Page 18 The preferred alternative indicates that "no surface disturbance in riparian habitats and 110 acres of protected soil sites" is a goal. This is very admirable but it is a fact that many of the roads in the Intensive Use Zone parallel or cross streams and stream beds.

62-18 | Page 42 Unavoidable Adverse Impacts For the three alternatives the acres affected by erosion are mentioned but not for the No Action alternative. Without knowing how many acres are affected now by erosion any comparison to other figures is meaningless. Additionally, how much erosion is now occurring (tons/acre/year) is needed.

62-19 | Air Quality No where in this document is air quality addressed. Considering the Red Hills have asbestos deposits, it is reasonable to believe a health hazard may exist to users who disturb the soils: possibly ORV users or adjoining land owning residents or agricultural operations. The potential for wind borne carcinogens resulting from intense ORV activity is not mentioned in the document.

62-20 | Water Riparian/wetlands: Throughout the report the term riparian habitat is used. However, the actual locations or conditions of these areas are not mentioned. BLM regulations published in the Federal Register (Vol 45 #25 6740.13 Feb. 5, 1980) require as a minimum, riparian inventory for condition by successional stages, cover and composition.

62-21 | No Action Alternatives The report states riparian habitat and soils are not specially protected. However, The Executive Order on Wetlands of 1977, requires BLM to preserve, enhance and protect riparian/wetland areas. They are also to avoid short and long term adverse impacts associated with degradation of wetland/riparian areas.

62-22 | Water Quality Due to authorized and unauthorized ORV use in the Intensive Use Zone, there is a planned exceedance level of 20% surface disturbance. Given the erosiveness level of the

62-22

soil, and runoff, why is there no mention of water quality impacts from sediments on aquatic life. What is the possibility of asbestos entering the streams and consequently Lake Don Pedro? What are the possible effects of leaching Magnesium & Iron into streams? How do the above mentioned water quality problems relate to the Section 208 Non Point Source pollution goals/criteria for the area.

Soils

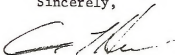
62-23

The soils should be considered erosive due to slopes, amount of precipitation and low infiltration/permeability rates. Permeability of these soils is slow due to the heavy clay restricting layer. Unauthorized ORV use in the Intensive Use Zone (IUZ) or the Restricted Use Zone (RUZ) would compound the runoff-erosion-sediment yield problems. Therefore, a workable plan for enforcing restrictions on unauthorized ORV use is at least as necessary as enforcement of "indiscriminate shooting".

62-24

On page 22 there are two soil series mentioned. The Henneke series is referred to as being "deeper than the Delpiedra soils". The Delpiedra is described as; loamy, serpentinitic, thermic, shallow (1'-2' deep), mollic, haploxerales. The Henneke is described as; clayey-skeletal, serpentinitic, thermic, lithic argixeroll. By its very definition Henneke could not be deeper since the term lithic, in the definition of Henneke means a depth to bedrock of less than 20".

Sincerely,



Greg Hurt
Supervisor
District Two

Sincerely,



Mildred Filiberti
Supervisor
District One

MF:emb

COMMENT LETTER #62 continued -- RESPONSES

- 62-1 See Revisions and Errata.
- 62-2 See Response 21-1
- 62-3 No significant impacts are anticipated from magnesium iron, oil and grease from ORV activity.
- 62-4 See Revisions and Errata.
- 62-5 The planned actions designed to protect sensitive plant habitat would also protect riparian habitat.
- 62-6 These are not objectives of the plan.
- 62-7 There is only one organized ORV event in the Red Hills. This event usually takes place in April and is a weekend event. One event each year is not a significant impact to other uses.
- 62-8 The majority of vandalism, resource damage and littering is caused by indiscriminate shooting and is concentrated along Red Hills road, which makes it more visible to the public.
- 62-9 Riparian areas are along the drainages shown on all maps.
- 62-10 See Response 2-1.
- 62-11 See Response 5-2.
- 62-12 A county ordinance for illegal activities other than indiscriminate shooting isn't necessary, since the County Sheriff would be able to cite violators for illegal activities such as littering, wood cutting, unauthorized ORV use and dumping, under applicable county or state ordinances and laws. Therefore, the Sheriff would not be required to enforce Bureau policy.
- 62-13 A cooperative agreement, between our State Director and the Director of Fish and Game, relating to wild turkey releases in the Red Hills has been signed contingent upon the approval of this Management Plan. The details as to the responsibilities of each cooperator are spelled out in this agreement.
- 62-14 Planned Action number 22 on page 7 clearly stated "unauthorized use", which encompasses any and all illegal activities.
- 62-15 This is Standard Operating Procedures (SOP) for Bureau-authorized activities.

COMMENT LETTER #62 continued - RESPONSES

62-16 See Response 6-2, 28-11, 40-7 and 62-5.

62-17 See Response 62-8.

62-18 See Revisions and Errata.

The amount of erosion presently occurring, which is usually determined in tons/acres/year, is unknown.

62-19 See Response 21-1.

62-20 Guidelines in the Federal Register (45 FR 7892; BLM Manual Section 6740.11B) February 5, 1980 requires inventories for riparian areas expected to be impacted by land management activities. Since none of the planned actions will impact existing riparian habitat, an inventory is not necessary.

62-21 This Management Plan, as it affects the riparian habitat, is meant to comply with Executive Order on Wetlands of 1977.

62-22 The proposed action would allow for 20% surface disturbance of the IUZ not increased ORV activity. ORV use would be limited to designated roads and trails identified on Map 4.

Projects involving surface disturbance would have site-specific EA's and appropriate mitigation measures to eliminate or reduce erosion and comply with the Best Management Practices outlined in the Bureau's Water Quality Management Report developed pursuant to Section 208 of the Clean Water Act.

62-23 See Response 62-12.

62-24 The source of our information on soils was: Gowans, K.D. and Hinkley, H.S., 1964. Reconnaissance soil survey of Tuolumne County, California. University of California, Agriculture Extension Service, page 6.

April 18, 1984
1510 Linwood Dr
Modesto Calif 95350

D. K. Swickard

BLM area manager

The Red Hills area near Chinese Camp in Tuolumne County has allways been a special scenic drive for me especially when the spring wildflowers make their annual splash of color. I like to stop and explore as I did last week when I brought several people with me.

We were angry at the destruction going on. Off-road vehicles were tearing up landscape - very fragil - as they roared noisily over the terrain. Indiscriminate shooting was destroying trees, rubbish was left everywhere, especially broken glass & shot up cans and plastic gadgets.

I took some pictures, both of beauty of area, and of the destruction going on.

Please, do something quickly to protect this public land from destruction. It belongs to all of us and you are supposed to protect it for future generations.

It is an ideal scenic route not far from a major highway and a nearby town. It has historical value as well as geological, botanical, biological, and scenic. It is easily accessible place for the elderly and handicapped and those hesitant drivers who want to enjoy nature's bounty. Photographers and bird watchers join the nature lovers.

The area is also well suited for a study area and a place for field trips and classes. The unusual soil - serpentine - contributes to the unusual and rare plants, the native fish-roach - and Horned Toad lizard. Designate it a scenic route and study area along side the Red Hills Road.

A better plan for ORV and shooters would be to build hills and a shooting gallery in the county dumps where they can tear things up to their hearts content.

COMMENT LETTER #64

California Native Plant Society
Mount Lassen Chapter
The Herbarium
Dept. of Biological Sciences
CSU, Chico, CA 95926

Dean Swicklard
Area Manager
Folsom Area Office
63 Natoma St.
Folsom, CA 95630

April 18, 1984

Mr. Dean Swickard,

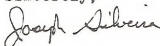
The California Native Plant Society believes that the draft management plan for the Red Hills Area of Critical Environmental Concern (ACEC) is unacceptable for protection of the rare plants in and adjacent to the area. The draft plan calls for an Intensive Use Area immediately adjacent to the ACEC. The resulting level of activity will have adverse impacts on the rare plants that inhabit the BLM property which includes populations of Red Hill soaproot (Chlorogalum grandiflorum), Congdon's lomatium (Lomatium congdonii), Rawhide Hill onion, (Allium sanbornii var. tuolumnense) and Red Hills vervain (Verbena californica).

64-1 The Red Hills ACEC is not suited to a full use land
64-2 management policy. As required by law, the four rare species must be managed so that Federal listing is not necessary. To accomplish this, the BLM must develop a management plan that will truly protect the rare plant populations of the Red Hills, especially the four narrow endemic species of this area. As a biologist and member of the California Native Plant Society Conservation Committee, I believe the ACEC must be expanded to include the large concentration of rare plant populations in sections 7 and 8. The ACEC must be closed to all off-road vehicle use. ORV use cannot be supervised to assure rare plant protection and could easily disrupt and destroy plant populations.

64-3 The rare plants found in the Red Hills comprise a unique resource to California. While the ACEC draft management plan attempts to satisfy all management needs, it fails to adequately protect a nonrenewable resource, i.e. the rare plants. The California Native Plant Society is interested in helping the BLM revise its management plan so that the rare plant species of the Red Hills are assured protection. It would be of great help if you could send a copy of the Red Hills ACEC draft management plan along with maps indicating the areas of concern

to me. Also, I would appreciate any comments that would clarify your concerns with this project; eg., your need to satisfy ORV use, rifle range development plans on sensitive areas, proposals for Federal listing of rare plant species in the area, and the U.S. Fish and Wildlife Service proposal for a preserve status for part of the Red Hills.

Sincerely,



Joseph Silveira
Conservation Chair
Mount Lassen Chapter
California Native Plant Society

64-1 See Response 3-1.

64-2 See Response 15-1.

64-3 There are no more copies of the Draft Management Plan and EA. It's interesting that you could make the comments without reviewing the plan and EA.

Sheldon L. Fredell

COMMENT LETTER #65

1700 ROBBIE AVENUE • MODESTO, CALIFORNIA 95350

Dean Swickard
Folsom Resource Area
63 Natoma St
Folsom, CA 95360

Dear Mr. Swickard

After having visited Red Hills recently, after having had the dubious pleasure of dodging small arms fire and listening to the roar of artillery and 4-WD, I feel that your plan, however laboriously arrived at, is impossible.

Your apparent lack of interest in enforcement of whatever rules of conduct may exist is too bad. I saw trees cut down with bullets and the most unbelievable collection of shattered glass.

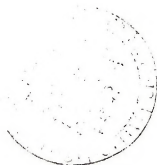
ORVs belong in Hollister Hills, in Don Pedro Canyon, or in lands already ruined by wheels. Even the call of San Juan Bautista Canyon is spoiled by the racket of these vehicles - why do the same to Red Hills?

Even in the event that you absolutely must have a rifle range (and I can't imagine why - surely that should be done on private land) why on earth would you want to have it where everyone for 15 miles around must hear the racket? Really!

Red Hills, where it's not ruined by thoughtless use, is marvellous. Let's keep it ~~the~~ enjoyable for all, not just a few.

Sincerely,

Sheldon L. Fredell



CONSULTATION AND COORDINATION

Public Involvement

The public was informed of a public meeting to obtain their input for the preparation of a Management Plan for the Red Hills by an information letter mailed out August 16, 1983, and a Federal Register notice published July 28, 1983.

Public input from this meeting and letters and other miscellaneous contacts assisted in the finalization of issues and alternatives for this Management Plan. Much information was obtained through consultation at a working level with other Federal, State, and local agencies. The draft Management Plan was then mailed out to interested agencies, organizations and individuals which were allowed a 45 day comment period.

Agencies, Organizations, and Individuals receiving a copy of this Document.

Agencies and Organizations:

U.S. Fish and Wildlife Service
California Department of Fish and Game-Region 4
Tuolumne County Board of Supervisors
Tuolumne County Planning Commission
Central Sierra Audubon Society
Sonora Mining Corp

Natural Resources Defense Council
Red Hills Sportsman Association
California Assoc. of 4-Wheel Drive Clubs, Inc.
Stanislaus Audubon Society
Great Valley Museum of Natural History
Environmental Defense Fund
California Off Road Vehicle Association, Inc.

Individuals:

Roger Alderman, Sonora, CA	Richard Hazelwood, San Francisco, CA
Warren Appling, Sonora, CA	L. R. Heckard, Berkeley, CA
Ross Baker, Tuolumne City, CA	John Herrick, Modesto, CA
Doug Barton, Ceres, CA	Alice Q. Howard, Oakland, CA
Hartley & Curt Bush, Oakdale, CA	Morris & Isabel Hunter, Oakdale, CA
Kenneth Calhoun, Modesto, CA	Sonia Hurt, Columbia, CA
Floyd Carne, Chinese Camp, CA	Shelby Hutchinson, Modesto, CA
Peter Chamberlain, Sonora, CA	Hans Jenny, Berkeley, CA
David Considine, Oakdale, CA	A. F. Jepson, Chinese Camp, CA
Lincoln Constance, Berkeley, CA	Michael Linn, Modesto, CA
Pete Dohms, Jamestown, CA	Bill Lundgren, Jamestown, CA
Harry Durlany, Modesto, CA	Jim Maddox, Sonora, CA
Ruby Fales, Modesto, CA	Carlo Michelotti, Stockton, CA
Stephen Fentress, Stockton, CA	John Mills, Sonora, CA
Margaret Flesher, Modesto, CA	John Moyle, Sonora, CA
Harry Hartman, Jamestown, CA	James Nuzum, Sonora, CA

Carol & Carolyn Perry, Chinese Camp, CA	Glen Holstein
Blaine Rodgers, Sonora, CA	Alice Meldy, Carmel, CA
Roy Schmidt, Modesto, CA	Ralph Newton, Livermore, CA
William Sienkowski, Jamestown, CA	Sidney Adelman, Sherman Oaks, CA
Helen Spencer, Modesto, CA	Randy Harris, Modesto, CA
G. Ledyard Stebbins, Davis, CA	L. A. Lindquist, Sonora, CA
John Wallin, Manteca, CA	Barbara Leitner, Oakland, CA
Helen Fredell, Modesto, CA	June Kohler, Sonora, CA
Joseph Silveira, Chico, CA	John Buckley, Miwuk Village, CA
Eloise Crary, Modesto, CA	S. K. Stocking, Stockton, CA
Carlo DeFerrari, Sonora, CA	Louise Parker, Modesto, CA
Bess Kirton	Jeff Jones, Sonora, CA
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REVISIONS AND ERRATA

1. Page 9, F.5., add - Study soil samples for the presence of asbestos.
2. Page 24, "Sensitive Plants", last sentence - delete.

The results of the sensitive plan study indicate that Coyote thistle is not found in the "vernal pool" (which is actually a drainage) in T. 1 S., R. 13 E., Sec. 1. Therefore, all reference to this plant should be deleted in this document. The drainage, however, is important habitat for Verben californica and will be protected, nonetheless.

3. Page 28, first paragraph - Change protection of Rawhide hill onion from 98% and 95% of the population in the RUZ and IUZ respectively to 100% and 95% of the habitat in RUZ and IUZ respectively.
4. Page 28, end of the third paragraph, add - Erosion caused by ORV activity would decrease due to closing 7.2 miles of ORV trails.
5. Pages 31, 34, and 36 - add to "Other Impacts:" - None of the planned actions will have an adverse impact on riparian areas, visual resource, water quality and quantity, or air quality.
6. Page 33, end of third paragraph add - Erosion caused by ORV activity would increase due to construction of 2.6 miles of new ORV trails.
7. Page 35, end of the first paragraph, add - Erosion caused by ORV activity would continue at its present rate.
8. Page 35, end of the fourth paragraph add - Erosion caused by ORV activity would decrease due to closing 15.2 miles of ORV trails.

9. Page 36, add to "Other Impacts:" - Visual Resources -- The abundance of ORV trails and unauthorized use in the area has resulted in a negative impact on the visual resource, especially along Red Hills Road. None of the activities under this alternative has an adverse impact on riparian areas, water quality and quantity, or air quality.
10. Page 42, change "5%" in Alternative 1, #2 to "15%"; and "7%" to "5%."
11. Page 42, Alternative 4, #1 add - At least 50 acres of surface are presently disturbed. Under this management scheme there is no limit to the amount of allowable surface disturbance.
12. Page 47, add - Surface Disturbance - the actual removal and/or disturbance of the topsoil.
13. Map 4 - "Proposed trails" in section 20 & 7 - delete. Connect open trail on hill in NW $\frac{1}{2}$ NW $\frac{1}{4}$ of section 20 with the open trail to the ridgetop in E $\frac{1}{2}$ E $\frac{1}{2}$ of section 19. Change the trail connecting sections 19 and 20 from "open" to "closed" from hill to road.

Appendix



APPENDIX A

The following is an extract from the final report submitted to the Bureau of Land Management from BioSystems Analysis, Inc. This report is the result of their independent study of four sensitive plant species on the Bureau's Red Hills Management Area, Tuolumne County, California. The report was prepared under BLM contract number CA-950-CT4-3, containing 59 pages plus appendices. A copy of this report is available for public review at the Folsom Resource Area office at 63 Natoma Street, Folsom, CA 95630.

SUMMARY AND CONCLUSIONS

A survey of sensitive plant species was conducted on the BLM Red Hills Management Area, Tuolumne County, California. A total of 65 small, localized occurrences of Allium sanbornii var. tuolumnense were documented and mapped, and census data were collected on 18 of these (28 percent). Allium occurrences were well distributed throughout the study area on Delpiedra soils. Censused occurrences ranged in total number of individuals from 6 to 213, with a mean value of 59.6 ± 87.2 individuals per occurrence. Allium density was significantly correlated with percent cover of loose surface rock, which in turn was significantly correlated with slope steepness. Allium occurrences were almost entirely restricted to steep, rocky, south-facing slopes, where we observed a strong microsite preference for patches of loose rock on active erosion surfaces characterized by reduced herb cover, often along the upper margin of gullies. The habitat of Allium is relatively well defined, as this taxon apparently does not (or is unable to) occupy areas of marginal habitat. Censusing and density sampling of Allium occurrences were negatively affected by a two-week period of unusually hot, dry

weather in mid-May, which abnormally shortened the growing season for this taxon and eventually made individuals difficult to recognize in the field.

Extensive reconnaissance surveys of the study area found Chlorogalum grandiflorum and Lomatium congdonii to be generally frequent and widespread throughout the study area on Delpiedra soils. Field observations indicated that both Chlorogalum and Lomatium are characterized by a contagious (non-random) distribution pattern on a localized scale, which would have required an exhaustive sampling to describe and map using quantitative methods. Analysis of density quadrat transect data employing a stratified random sampling design ($n = 115$) showed a mean Chlorogalum density on ridge sites of 3200 ± 980 plants per hectare, significantly greater than on all other site types. Upper south-facing slopes were also important, with a mean density of 1600 ± 620 plants per hectare. Lomatium density was significantly higher on upper and middle north-facing slopes than on all other site types, with 6566 ± 4767 plants per hectare and 4700 ± 3348 plants per hectare, respectively. The distribution of Chlorogalum grandiflorum and Lomatium congdonii within the study area was mapped in five density classes.

A pair-wise correlation analysis based on the transect density and site variables showed that Chlorogalum density was significantly correlated with slope steepness, confirming the observed preference of this species for ridge sites. Chlorogalum density was also significantly positively correlated with percent cover of exposed bedrock, which in turn was significantly negatively correlated with herb cover. Optimal microsites for Chlorogalum grandiflorum are localized patches of exposed bedrock characterized by reduced herb cover.

A significantly reduced mean Chlorogalum grandiflorum density was observed on sites located within areas burned in 1982 (n = 39) compared with sites not recently burned (n = 76). This effect was associated with significantly lower shrub and tree cover and increased herb cover (primarily introduced annual grasses) on the 1982 burns. Competitive exclusion may have a role in inhibiting reestablishment of Chlorogalum on burned sites, and may also explain the observed microsite preference for exposed bedrock areas with significantly reduced herb cover. By contrast, our data and field observations suggest a positive burn response for Lomatium congonii density, although the effect was not statistically significant.

Layne's butterweed (Senecio layneae), a CDFG designated Rare species and candidate for listing by USFWS, was found in three small, localized occurrences on serpentine in the southeastern portion of the study area. Herbarium specimens collected in the Red Hills were determined by Dr. T.M. Barkley of Kansas State University, Manhattan, a noted authority on Senecio. The species was previously known from several occurrences in El Dorado County, and the Red Hills occurrences constitute a 70-mile range extension to the south. The habitat for Senecio layneae in the Red Hills is on rocky, disturbed roadsides and roadbanks or in rocky ephemeral drainages, on north and east-facing slopes.

With the exception of Verbena californica, no other BLM sensitive plant species were observed in the Red Hills Management Area during this study.

A series of recommendations for management and further study have been developed based on the results of the study. These recommendations are presented in the following sections.

MANAGEMENT RECOMMENDATIONS

GRAZING MANAGEMENT

East of the divide separating lower Sixbit Gulch and Poor Man's Gulch, the southeastern section of the Red Hills Management Area is currently part of an active grazing allotment. Grazing impacts on native vegetation were evident in this area, centering on Poor Man's Gulch. Grazing impacts on sensitive plants were also evident. For Lomatium congdonii, we observed that plants in the more heavily grazed areas were generally shorter in height and reduced in stature compared with nearby, lightly grazed areas. Chlorogalum grandiflorum was seemingly less common in heavily grazed sites in comparison to lightly grazed sites. The possible effects of grazing upon density of these two species has not been addressed in our sampling and data analysis (primarily due to small sample size on grazed sites), and therefore the relatively high Lomatium and Chlorogalum densities mapped in the southeastern portion of the study area (Figures 7 and 10) may require some modification. Significant grazing impacts on Verbena californica were observed in the extreme northwestern portion of the study area (SW $\frac{1}{4}$ of SW $\frac{1}{4}$ S.1, T.1S R.13E). Plants of Verbena were heavily cropped and noticeably smaller than in ungrazed sites.

Pending the results of further studies, it seems prudent to recommend reduced stocking on the allotment in the Poor Man's Gulch area. Optimally, grazing should be eliminated entirely from the Verbena californica site mentioned above.

FIRE MANAGEMENT

Fire has played an obvious and major role in vegetation dynamics within the Red Hills ecosystem. We observed that non-native grasses assume dominance in the vegetation following recent burns in the study area. Our observations suggest that Chlorogalum grandiflorum density may be reduced and Lomatium congdonii density may be enhanced on recent burns. Although sampling was not specifically conducted to test these hypotheses, the trend is evident and, in the case of Chlorogalum, statistically significant. However, until further studies can be conducted to firmly establish the relationship between fire history and population dynamics of these sensitive species, sound recommendations regarding fire management vis-a-vis protection and management of these species cannot be made. Preliminary results suggest that a fire management policy designed to benefit one species may act to the detriment of the other, so that managing for the relative scale and frequency of fire may become a concern.

MINING ACTIVITY

Although there is presently only limited mineral potential in the Red Hills, there has been historic production of chromite, magnesite, and gold. The historic magnesite production in Tuolumne County came from two deposits in the Red Hills. Currently, there is no market for magnesite. Presently there are seven placer claims in Sections 22, 23, and 26 (T.1S R.14E). There is a potential for lode deposits along the contacts of serpentine and the Calaveras formation and at the magnesite deposits (BLM 1984).

Because most of the past mining activity is located on private lands, we observed few direct mining impacts to sensitive plants within the study area.

An extensive tailings deposit occurs along Sixbit Gulch, the result of past mining operations in the area. However, only a portion of this deposit is located on public land. Mine tailings also cover a less extensive area on private land along Poor Man's Gulch. Tailings deposits probably have removed actual occurrence area and/or potential habitat for Verbena californica and Senecio clevelandii var. heterophyllus, which are narrowly endemic to intermittent or weakly perennial stream environments on serpentine in the Red Hills. However, we did not study these two taxa in detail, and therefore no specific management recommendations are proposed.

RECREATIONAL USE

The Red Hills Management Area attracts a variety of recreationists, including target shooters, off-road vehicle (ORV) and motorcycle enthusiasts, horseback riders, and photographers. There is one organized ORV event each spring in the Red Hills, involving about 300 people. The area is also used occasionally for National Guard, Army Reserve, and Marine Corps Reserve maneuvers. The Sonora Smoke Polers and the Civil War Skirmish Association have a Recreation and Public Purpose (R&PP) lease for a shooting range in the western part of Section 16, T.1S R.14E (BLM 1984).

Target shooting has historically been focused in the above-mentioned Section 16 leasehold and within a relatively narrow corridor along Red Hills Road. ORV activities appear to have been concentrated mainly along existing jeep roads and trails, although a

network of trails created by crews battling the July 1982 fire has resulted in expansion of ORV use on both sides of Red Hills Road in the central part of the study area (S½ S.18 and N½ S.20, T.15 R.14E).

The County of Tuolumne has expressed an interest in a lease for a shooting and archery range complex which would be built to National Rifle Association standards. The proposal calls for a campground, parking area, and caretaker's quarters, along with rifle, handgun, blackpowder, archery, and trap and skeet ranges. The proposal involves about 1300 acres of public land in the southern portion of the Red Hills Management Area. No formal application has been filed (BLM 1984).

Trampling, soil erosion, and other forms of habitat disruption associated with target shooting and ORV use have undoubtedly negatively affected occurrences for the most frequent and widespread sensitive species in the Red Hills, Chlorogalum grandiflorum and Lomatium congdonii. Continued use of areas already affected by these actions would constitute only a minor impact, considering the overall distribution and abundance of these two species within the study area. However, a development of the size proposed for the above-mentioned shooting range complex is unprecedented within the area and would almost certainly result in substantial impacts to the Chlorogalum grandiflorum and Lomatium congdonii populations in the area.

Although widely distributed throughout the Red Hills area, occurrences of Allium sanbornii var. tuolumnense are limited in area and size (in terms of total number of individuals) due to very specific habitat requirements. Because of the discrete and limited nature of Allium occurrences, they should be avoided and protected whenever possible in the process of reviewing multiple-use proposals for public lands.

Two of the three occurrences of Senecio layneae found within the Red Hills Area are located on disturbed, rocky soils associated with roadsides and roadbanks. Due to their proximity to roads, these occurrences should be perceived as threatened. However, the southern part of the Red Hills area receives much less visitor use when compared with the corridor along Red Hills Road (R. Farve, personal communication 1984). The Senecio layneae occurrences associated with roads in the Red Hills should be periodically monitored, and protective measures (such as fencing) should be considered if adverse impacts resulting from human activities are identified.

RECOMMENDATIONS FOR FURTHER STUDIES

1. Particularly in the western and northwestern parts of the study area, soils mapped in the Delpiedra soil series (Stone et al. 1977) locally appear deeper and less stony than the Delpiedra soils mapped elsewhere in the Red Hills complex. These areas also support herbaceous and woody vegetation similar to that observed in other parts of the study area on Henneke soils. Because of this apparent inconsistency between soil and vegetation types in some parts of the study area and the strong correlation of sensitive plant distribution with soil type, we recommend that a more detailed mapping of soil-vegetation complexes in the area be completed.

Also, some studies of soil chemistry and nutrient status on the serpentine soils of the Red Hills may be helpful in defining the ecology of sensitive plant species in the area. In particular, the role of soil infertility and/or toxicity in controlling herb cover and in creating available habitat for sensitive plant species needs to be determined.

2. Our knowledge of the distribution of Allium sanbornii var. tuolumnense in the study area is probably relatively complete, primarily due to the very specific habitat requirements observed for this taxon. However, the abundance of Allium within its known occurrence areas in the Red Hills remains incomplete, due to abnormally hot, dry conditions which greatly shortened the period of blooming and reproduction and eventually made it difficult to recognize plants in the field, even in known occurrence areas. We recommend that censusing of the total number of individuals (or absolute density sampling in the case of larger occurrences) be completed for known Allium occurrences in the study area.

3. The sample size for our density quadrat transect sampling was adequate to represent the range of variability in Chlorogalum grandiflorum and Lomatium congdonii density within the study area. However, additional density sampling would reduce the rather large confidence intervals associated with the mean densities reported for these species. Also, our field observations indicated a clustered (non-random) distribution for these species on a more localized scale than that described in our density class mapping. An intensive, systematic sampling procedure could be used to quantify these localized density patterns (i.e., closely spaced, parallel transects with quadrat data collected at regular intervals along each transect).

4. Results of preliminary data analysis suggest that Chlorogalum grandiflorum density is significantly reduced and Lomatium congdonii density is increased on recently burned sites. However, additional density sampling is required to substantiate these hypotheses. Fire history within the Red Hills area is relatively well known from 1960 to the present (BLM 1964). Fire history prior to 1960 could be obtained by age-class analysis and mapping stands of digger pine (Pinus sabiniana). Detailed correlative

studies of sensitive plant distribution and abundance in the area may then be conducted. Greenhouse experiments should be conducted to determine if seeds of Lomatium congdonii possess any special germination requirements (i.e., heat treatment) that would indicate fire adaptation.

5. We observed that Lomatium congdonii plants in more heavily grazed areas were generally shorter and reduced in stature compared with nearby, lightly grazed areas. Chlorogalum grandiflorum was seemingly less frequent in heavily grazed sites in comparison to lightly grazed sites. However, potential adverse effects of grazing on distribution and abundance of these taxa need to be tested and quantified. We recommend a transect quadrat sampling protocol similar to that utilized during this study, with data on plant height, subjective vigor ranking, and livestock utilization data collected for each sensitive plant rooted within the quadrat (in addition to the density and site factors). The resulting density, height, vigor, and utilization data may then be tested for significant differences between grazed and ungrazed sites.

Alternatively, exclosures may be used in heavily grazed areas to determine the effects on sensitive plant height, vigor, and density.

6. Hoover's butterweed (Senecio clevelandii var. heterophyllus), a narrow endemic of intermittent stream habitats on serpentine in the Red Hills area, has recently been considered a candidate for listing under the Endangered Species Act (USFWS 1980). However, a recent treatment of the North American species of Senecio (Barkley 1978) did not recognize var. heterophyllus as distinct from the var. clevelandii, a serpentine endemic of Lake and Napa counties in California's North Coast Ranges (Munz and Keck 1968, Smith and York 1984). As a result, the widely disjunct var. heterophyllus is no

longer currently under review for Federal listing (USFWS 1983). Several participants in the present study (Clifton, Davilla, Stone, Willoughby) have first-hand experience with Senecio clevelandii based on field work conducted in the North Coast Ranges, and they observed that the Red Hills plants are more robust than those found in the North Coast Ranges. We recommend that a more detailed taxonomic study of the Senecio clevelandii complex be completed in order to test the hypothesis that the Red Hills population (var. heterophyllus) is distinct from the population in the North Coast Ranges (var. clevelandii).



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